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Dear Annie,

**Waterloo Metro Quarter Precinct Over Station Development – Concept State Significant Development Application – SSD 9393**

I refer to your invitation to comment on the above mentioned State Significant Development application for a proposal on land bound by Raglan Street, Cope Street, Wellington Street and Botany Road, Waterloo (excludes Waterloo Congregational Church). It is understood that the site is subject to Critical State Significant Infrastructure (CSSI) approval and the subject application is a concept proposal for the over station development component on the site.

The concept application seeks consent for maximum building envelopes, maximum gross floor area, land uses, pedestrian and vehicle access, car parking, public domain works including a through-site link and public spaces, signage zones, future subdivision (if required) and structural, servicing and space provisioning integration with the station infrastructure under the CSSI approval. The applications also seek approval for strategies for stormwater management, ecological sustainable development, public art and design excellence.

A State Significant Precinct Study (the SPP Study) has been lodged concurrently with the NSW Department of Planning and Environment (the Department) for the development of the site. The Study is accompanied by a proposed draft SEPP amendment to include the Metro Quarter within Schedule 3 of the State Significant Precinct SEPP as well as applying a suite of new controls for the site. The proposed SEPP would, when finalised, mean that the City of Sydney's local controls, Local Environmental Plan 2012 (the Sydney LEP 2012) and Development Control Plan 2012, no longer apply to the Metro Quarter. The City is preparing a separate submission to the Department in relation to the SSP. Matters raised in this letter should be read in conjunction with that submission.

With respect to the subject concept application and in light of the status of the concurrent SSP Study, the City note the following:

- The application represents significant non-compliances with the planning controls that currently apply to the site;

- It is extremely premature to submit a concept proposal for future over station development on the site under a planning framework and new controls that are neither certain nor imminent;

- In its separate submission, the City has objected to the SSP Study raising significant concerns about lack of consideration given to and integration with the renewal of the Waterloo Estate, among other matters, which unsurprisingly have been translated in the subject SSD application; and

- There is a lack of detail provided in relation to fundamental matters that require assessment as this stage of the development including environmentally sustainable design, resolution of public domain matters, a design excellence pathway, traffic impacts, and critical urban design and heritage considerations that will have a long term impact on the future residents of the development and the wider Waterloo community.

- The SSD should be exhibited alongside the Waterloo Estate proposal to ensure that the substantial cumulative impacts of both proposals are considered together.

In summary, the proposal represents a poorly resolved scheme, which is a direct result of its untimeliness against a planning framework still in its infancy that is being established for the site. For these reasons, the City **objects** to the concept proposal.

Notwithstanding the above, the proposal has been reviewed on a first principles basis with the following matters raised for your consideration:

**1. Design Excellence**

There appears to be a fundamental misunderstanding by the proponent of what constitutes a design excellence process and how design excellence is achieved, which is clearly reflected in the current controls that apply to the site (Sydney Local Environmental Plan 2012).

While the submitted Design Excellence Strategy may improve tenderers' design submissions to achieve better design, it fails to set out an approach that entails a competitive design process to achieve excellent design outcomes. A competitive design process is a prerequisite to Design Excellence as it serves to demonstrate the superior quality of a proposed development through the comparative evaluation of several competing design concepts. It cannot be known if a particular design is superior where there is no alternative for comparison.

It is noted that both the Environmental Impact Assessment (EIS) and Visual Impact Assessment (VIA) rely heavily upon the achievement of design excellence to address the visual impacts of the proposed towers. As there is no competitive design process proposed and no detail is provided about the proposed provisions to deliver 'design excellence', it is questionable whether the achievement of design excellence can be relied upon to address visual impact concerns.

**2. Affordable and Social Housing Provision**

With approximately 700 dwellings to be provided under the residential component of the over station development, 10% of that total is intended to be social housing with an additional 5 - 10% of the accommodation to be affordable housing but only for 10

years. It is unacceptable that the social or affordable housing would only be provided for a 10 year period. Social and affordable housing must be provided in perpetuity, which is consistent with the policy position of the Eastern District Plan and the State Environmental Planning Policy 70, which identifies the City of Sydney Local government area having a strong need for affordable housing. Further, the allocation of social and affordable housing should be distributed equitably across all unit sizes and levels of the residential buildings to promote social cohesion in the community.

**3. Heritage**

Setbacks

While there are several heritage items within the vicinity of the subject site, Waterloo Congregational Church, which is a locally listed heritage building located at 103–105 Botany Road, is considered central to heritage considerations. It is directly adjacent to the proposed new development to the north, east and south with proposed new basements in very close proximity to the church.

Minimal building setbacks to all four sides of the site directly impact the podiums' ability to tie the development into its context and creates an unacceptable heritage impact on the church and the critical interfaces with other existing heritage items on opposite corners to the north, west and south of the site.

It is noted that the areas without adequate setbacks are not adequately shown in the indicative renders for the design (figures 19 – 21 in the Heritage Impact Statement) and their visual impact in relation to podium and streetscape is understated graphically in the renders and view analysis documents. In the renders, the towers are obscured by tree plantings which, while desirable, are ambitious as they may not be possible at the planting densities shown due to the Roads and Maritime Services restrictions on trees adjacent to arterial roads.

Awnings/shade structures

The Wind Report identifies a through-site link located between the church and the central podium as being prone to adverse wind conditions due to down washing off the central tall building (Building E) onto the link. Direct westerly and north-easterly winds funnel through the through-site link worsening conditions. The report recommends use of an impermeable awning over these areas to assist the downwash wind. This structure will have the effect of deflecting wind from the generous public pedestrian link that has been specifically designed to physically separate the heritage item from the podium and tower to the north and provide an appropriate setting/curtilage to the church.

As the Waterloo Congregational Church is a significant, pre-existing site constraint, the design of the new podium and towers must be amended to ensure that the setting of this heritage item is optimised and its fabric conserved. An impermeable wind deflection structure adjacent to the church is not acceptable. The configuration of podium and tower adjacent to the pedestrian link north of the church needs to be amended in order to reduce any wind downwash/impacts to an acceptable level of pedestrian comfort without the need for an impermeable awning or other intrusive structures. These design changes may need to deal with a number of variables including tower set-backs, tower shape, façade modulation of the tower and podium, etc.

Basement impacts

Concerns are raised about the proximity and design development of the basements to eliminate the risk of excavation damage to the Church. The size and configuration of the basement levels should be revised to minimise structural impacts on the existing heritage item.

**4. Amenity**

Noise

The submitted Acoustic Report is found to be deficient for the following reasons:

- The research study quoted to support the 'outdoor to indoor loss' of 12dB through attenuation to the balcony may not be achievable, as the geometry of the 'test' balcony differs substantially to a typical residential balcony. The 'test' balcony is 8.2m wide, 3.6m deep, 3m high with a downturn to the roof of 0.6m providing non-typical shielding and smaller than normal opening aperture height.

- The research study uses speech intelligibility levels (SIL) rather than 'A' Weighted Sound Pressures dB(A). It is considered that dB(A) is a more appropriate measure as it is a weighting of frequencies which reflects the full range of human hearing whereas SIL is a selection of frequencies specific to speech intelligibility;

- The predicted 'outdoor to indoor loss' of 12dB cannot be assumed to be additional to the accepted 10dB loss through open windows, as the 10dB loss already assumes some attenuation through building elements;

- Incorrect noise criteria is used for the study - Clause 102 of the SEPP (Infrastructure) 2007 requires 40dB for living spaces rather than 45dB stated in Sydney Development Control Plan 2012. The solar access results in Appendix D may not accurately reflect compliance with the internal noise goals during the daytime period;

- The Acoustic Report defers the responsibility to demonstrate and validate any opening system to achieve a minimum of 15dB reduction to future design stages. This is not acceptable as the in-principle methodology in the report is flawed as discussed above. Achieving compliant noise levels for residential use is not demonstrated in the application and suitability of the site for residential uses is not confirmed.

Acoustic Amenity and Natural Ventilation

Botany Road is characterised by significant air and noise pollution. Insufficient information is provided to confirm how the layout of noise impacted apartments facing Botany Road successfully achieve the stated noise reductions. Page 58 of the Noise Report notes that to achieve compliance in areas where exceedances of the controls are predicted, the internal floorplate should be developed such that living spaces (not bedrooms) are located at the opening locations which are found to not comply with the night-time criteria.

Significant amendments to the Acoustic Report are required to demonstrate both compliance with the Infrastructure SEPP, and feasibility of the site to accommodate

residential uses. If this is not possible, consideration should be made to locate non-residential uses facing Botany Road or, reconsider the scale of the residential component of the development considerably.

Ventilation

The indicative layouts do not demonstrate that compliant levels of natural and cross ventilation is achieved in the 'base case' scenario for the site and therefore 'good' amenity is not achieved.

It is noted that not all of the apartments identified on drawings as being naturally cross ventilated can be included in the count. Apartments with indentations facing a single orientation are unlikely to be exposed to wind pressures which are significantly different to achieve cross ventilation.

Solar access

Compliant solar access is not verified by details submitted with the application. The material provided for solar access is the large scale plan shadow diagrams (Appendix H), and plans showing solar access results (Appendix D). This does not allow enough detail to demonstrate the quantity of sunlight to living room glazing, nor to whether sunlight reaches set-back areas of glazing. Further, the proposed methodology for achieving solar access where apartment layouts are affected by noise impacts is flawed as it only counts those apartments with a west facing frontage to Botany Road as being noise impacted (north and south facing units are also affected).

Building Separation and visual privacy

The proposed intrusions into the minimum separation zones are not supported on the basis of residential amenity. The building envelopes are to be modified to ensure that balconies do not encroach into the minimum 24m separation distance (includes the balcony depth) for building heights over 25m, in accordance with objectives of the Apartment Design Guide.

General

In particular, Botany Road as a Classified Road, provides substantial challenges for accommodating sensitive uses such as the proposed residential towers. The application does not demonstrate satisfactory amelioration of environmental impacts such as wind, noise and overshadowing.

At this stage, the City are not prepared to support a development with a residential offering of this this scale without a degree of certainty that an acceptable level of residential amenity can be achieved for future residents that accords with the relevant State planning policies that guide apartment design referred to above.

**5. Urban Design**

Contextual relationship, built form and scale

The proposed primary built form controls do not acknowledge the existing lower context at the western and southern boundaries of the site and does not consider any transition in bulk or height.

Tower setbacks above the podium on the Botany Road, Raglan Street and Cope Street frontages are inadequate or non-existent, which is not supported. Such setbacks should be increased to reduce the scale impact of the towers on the street environment, and reduce dependence on awnings for managing wind impacts. It is recommended that tower setbacks should be a minimum of 8m subject to further wind testing and competing urban design objectives.

The northern podium appears to be almost 100m long. This is an extremely long facade without break or variation and appears out of scale and not in keeping with the surrounding context, which is much finer grain. The podium should be broken into smaller sections and treated as separate buildings. A repetitive approach to fine grain articulation over a facade of this length will not be adequate to break down the scale.

**6. Public Realm**

Alexandria Park

The proposed tower development overshadows portions of the north eastern corner of the park at 9am at mid-winter. While not a numeric non-compliance with the existing site controls, any overshadowing to Alexandria Park is unacceptable to the City for the following reasons:

- The proposed increase in density (up to 700 apartments) on the subject site is not accompanied by any new additional public open space to accommodate the increased population, placing greater pressure on existing open space areas;

- Communal open space is not adequately provided for in the proposed scheme (refer Point 7 below):

- The shadow occurs at a well-utilised time (before work) when the amenity of the park would otherwise be greatly increased through early morning sunlight and warmth; and

- Significant state urban renewal projects such as this must seek to establish high quality benchmarks for amenity of public open space rather than to achieve minimum compliance with numeric controls. The renewal of the Metro site will set a precedent for redevelopment of adjacent sites along Botany Road. Establishing a 'first principles' benchmark of no additional shadow to Alexandria Park should be the starting point for the development of primary built form controls.

Cope Street Plaza

The Cope Street Plaza space is the primary open space offered as part of the development, but is significantly diminished in size and functionality by the proposed community building (Building H). The proposed scale and arrangement of the Plaza in concert with the Metro entrance will be dominated by movement.

The Plaza appears to be intended to provide supplementary open space/passive recreation for residents, and support outdoor seating to ground level retail. The inclusion of Building H places further constraints, occupying valuable, sunlit outdoor space and creating ‘leftover spaces’ to the south and south-west corner of the plaza. Subsequently, the plaza becomes smaller and inherently less useable, and the

shared street to the south of the plaza becomes more of a laneway rather than an extension of the plaza and landscape spaces.

Although the concept of activating the plaza with retail and community facilities is supported, these activities should be integrated into the surrounding buildings. The removal of Building H would increase the useable, sunlit outdoor space, which will become increasingly valuable as the redevelopment of Waterloo progresses. The plaza should be open space in its entirety, rather than providing the setting for an additional building.

‘Shared street’ and Through-Site Link between Botany Road and Cope Street

Although described as a ‘shared street’ for vehicles and pedestrians, this laneway predominantly facilitates vehicle access to the basement car park. The carriageway is predominantly fronted by back-of-house services including a bike store, substation, service bay and fire escape.

This street is the only external mid-block route between Botany Road and Cope Street, and should be able to facilitate heavy pedestrian traffic. However, the drawings illustrate a wide vehicular zone outside the car park with only a narrow continuous footpath to the southern (non-plaza) edge. This street effectively becomes a service lane, rather than a generous, safe pedestrian connection and an appropriate setting for the heritage listed Waterloo Congregational Church.

It is critical that pedestrians have priority over vehicles in this zone. In support of this, the carriageway width should be the absolute minimum width required for two-way vehicle movement and physical elements should hinder vehicle speed. Relocating services such as the substation at Building E would optimize ground level commercial uses and retail activation to this shared street.

The function and expected amenity of the through-site link needs to be resolved at an early stage. The through-site link ought to have a direct accessible path of travel so that wheelchairs users do not need to divert to the ‘shared street’ adjacent to the church to navigate between Botany Road and Cope Street.

Alignment of the through-site link through such a long street block may encourage unsafe crossing of Botany Road by pedestrians seeking to reach the buses on the west side of Botany Road. A signalised intersection on Botany Road mid-way along the block is needed to enable safe crossing and efficient pedestrian access to transport services.

General

The documentation submitted in relation to the public spaces, including crowded place protection measures, is unclear and appears complicated with respect to ownership, insurance, and maintenance responsibilities and whether those areas not currently under the ownership of the City are intended to have ownership transferred. This needs to be clarified at an early stage to ensure a future agreement between land owners.

It is understood that a Metro Interchange Access Plan and Station Design and Precinct Plan (SDPP) are required for the site by conditions of consent under the CSSI approval for Metro. The SDPP will include objectives, principles and standards to maximise amenity of public spaces and permeability, design the urban context, and outline relevant urban design and infrastructure standards and guidelines,

among other public domain and place making matters. The Station Precinct Plan is required to be prepared in consultation with Council and endorsed by the design review panel (DRP). At this stage those plans are not yet approved. Despite this, the subject SSD application has been lodged and includes various public spaces, a new 'shared street' and through-site link. The SSD, which should be guided by the SDPP, is therefore premature with critical public domain matters yet to be resolved.

**7. Common Open Space/Landscaping**

The reference design illustrates 25% of the total site area being allocated for communal open space for the residential buildings. This is provided at various levels between the podium and tower roofs. Generally speaking green roofs are supported by the City however, given the proposed building heights and adverse wind conditions, green roofs on buildings are unlikely to be well used as communal open space.

It is noted that the communal open space to level 5 between buildings B and C receives almost no sunlight, contrary to the requirements of part 3D of the ADG. Further, the wind report highlights a non-specific requirement for dense planting, wind-screens and fixed furniture to the communal open spaces. Both of these issues indicate that the communal open spaces will be compromised in the detailed design stages and needs to be reconsidered prior to any concept approval to ensure its provision is factored into the layout and redesign of buildings.

Continuous street tree planting is illustrated along Botany Road. While this principle is supported, the positioning of trees to the back of kerb is unlikely to be feasible due to Roads and Maritime Services (RMS) restrictions on clear zones (as identified in their landscape guidelines). Regardless of RMS restrictions, with a road of this vehicle capacity, it is preferable for street trees to be well set back from the kerb (minimum 3m) to enable a more complete canopy and reduce the likelihood of vehicle strike.

Basements should be equally set back to ensure adequate soil depth for street trees. Raised planters along streets are not acceptable to mitigate the impacts of basement encroachment.

**8. Wind Impacts**

There are several deficiencies in the Pedestrian Wind Report which must be addressed prior to determination. For example:

- Elevated pedestrian accessible areas were not considered (page 49);
- Inappropriate criteria are used to assess wind impacts. It is the City's position that it is not appropriate to assume 'walking' criterion for areas where pedestrians will be standing or sitting, for example at the southbound bus interchange on Botany Road, and at all locations within the 'Community Square', and at residential foyer entries;
- The lowest criteria (sitting) of 4m/s was not considered at all for the study (page 49);
- The Wind Report shows photos of the model used in testing. The model did not incorporate the overhanging tower forms described in the indicative

scheme or building envelope plans. See eastern alignment of Building E and north-western alignment of Building A; and

- A setback dimension of 8m is considered a base case scenario for development of sites with tower forms. A reduced setback may be considered if equivalent or improved wind conditions and wind safety levels can be achieved in adjacent public spaces.

Further wind tunnel testing is required to confirm the efficacy of the amelioration treatments recommended in the Wind Report. Without detailed testing to confirm results, there is no guarantee that an acceptable outcome will be achieved.

## 9. Transport

Car Parking

The indicative scheme proposes 380 resident car parking spaces for 700 dwelling units with up to 50 additional spaces for commercial uses. While this number may comply with Sydney LEP 2012 maximums for car parking, this number is excessive when considering the car parking is for development above a metro station and is vehemently opposed by the City.

Provision of this amount of parking directly impacts on the overall objective of the Metro Train Line which aims to shift people from car driving to using the train. The mode share targets to shift private car users to public and active transport uses will never be achieved without making the parking supply competitive. Availability of car parking spaces at origin and destination points is considered the most difficult obstacle to shifting people to use more sustainable transport methods.

The Department are strongly advised to insist the proponent work together with the development partners, TfNSW, RMS and strive for 'zero' car parking provision or absolute minimums. This way the development can be expected to generate much less new car trips and will not adversely affect the existing adjacent road network, which is already congested.

Traffic Impacts on Adjacent Road Network

The Traffic Impact Statement (TIS) does not present sufficiently detailed traffic modelling (input parameters/output results, microsimulation result). The traffic modelling should comprise baseline traffic generation plus the cumulative traffic generation from adjacent development plus the projected traffic generation for the subject proposal. This is a fundamental requirement for understanding the cumulative impact of the future development on the existing and proposed road network. The excessive number of car parking proposed exacerbates concerns in this regard.

It is noted that traffic generation from the retail/commercial uses has been ignored in the TIS despite retail/commercial spaces having a much higher trip generation rate than residential uses. Given the proximity to the station, the City is more likely to support a lower traffic generation rate particularly if this was supported by zero or significantly lower car parking rates.

In addition, the traffic modelling/analysis did not show vehicle queue length though the TIS has stated that a microsimulation has been done. Given that vehicle access will be provided for 316 car/vehicles from the proposed shared street between

Botany Road and Cope Street, concerns are raised about the vehicle queue lengths and functionality of that new street in peak hours. Assuming that the whole area will be in high pedestrian demand in the morning and afternoon peaks, detailed analysis of vehicle queue and pedestrian/bicycle safety, interactions to the car traffic and people who walk and ride, should be critically analysed and include trips generated by all uses, not just residential.

Overall, the applicant needs to undertake a more detailed analysis of the potential trip rates generated by the development. Sufficient supporting evidence and rigorous analysis is required to fully understand the traffic implications of the development for the local community and future residents.

Pedestrian Safety

Serious concerns are raised about pedestrian safety at key intersections as a result of the combination of development comprising the Metro, over station development and the wider Waterloo Estate.

As mentioned under Point 6 above, details pertaining to public domain works including pedestrian facilities are largely unresolved at this stage and need to be addressed via the Interchange Access Plan and Station Design Precinct Plan before this application can be determined to avoid potentially unsafe levels of crowding at intersections.

**10. Environmentally Sustainable Design (ESD)**

The City remains unconvinced that the proponent has a genuine commitment to reduce carbon emissions and manage energy, water and waste efficiently in line with the Sustainability Planning Priorities of the District Plan, in particular Planning Priority E19 and its associated actions. The District Plan requires that the Waterloo Estate, including Metro Quarter, contribute to achieving net-zero carbo emissions by 2050, by establishing a low-carbon precinct.

This lack of commitment is conveyed by numerous vague statements of intention and significant inconsistencies between relevant documents including the ESD Report, the Environmental Impact Statement (EIS) and the Design Guidelines submitted with the application. For example:

- Renewable energy: the ESD reports states it's possible to achieve 5% onsite generation whereas the EIS indicates that the Metro Quarter does not propose to incorporate any on-site electricity generation, storage and / or transmittal to the broader electricity grid though it could potentially include it at a more detailed DA stage. Notwithstanding this inconsistency, 5% renewables target lacks ambition, ignores innovation (façade solutions) and is not in line with NSW Government's publically stated Net Zero Carbon by 2050 position. Projects controlled by the NSW Government ought to show leadership by demonstrating best practice.

- The proponent indicates that they will examine the feasibility of centralised heat extraction systems and glazing options to improve thermal comfort 'in future considerations' (pages 51 and 52 of ESD Report). However, effective design solutions that can genuinely improve high rise energy performance and thermal comfort need to be embedded into the design now as opposed to post construction, or once design detail is advanced. These matters are critical to address the climate resilience needs of future occupants.

- Statements promising ‘commitment beyond compliance targets for BASIX water/energy’ (pages 59 and 60 of ESD Report) are weak responses that offer little assurance. ‘Beyond’ could mean as little as 1 point above the minimum. BASIX Energy Target of 40 and BASIX Water Target of 50 have been modelled as achievable for high rise and BASIX 60 where precinct recycled water supply is available.

- The proponent’s consideration to water recycling and servicing options involving connection to the City’s infrastructure may be supported however, we would expect higher value uses and not just irrigation (page 61 of ESD Report). Specifically cooling tower top up and toilet flushing. Irrigation alone may not impact significantly on over all mains potable water savings which is a core part of Sustainable Sydney 2030 environmental objectives.

- The response to operational waste is very unresolved and is largely business as usual. Again, by progressing this SSD process ahead of a precinct wide master-planned approach, innovations in resource recovery, waste avoidance and recycling are being eliminated.

- There is little acknowledgement of the need to improve resilience outcomes in relation to known impacts of climate change in the design of the development despite submission the Climate Change Adaptation Report for the Waterloo -Metro Quarter. The report scarcely acknowledges the well-established and accepted impacts of climate change that will affect inner Sydney. A much stronger response is required with regard to how the proposed development will respond to power outages, extreme heat events, and extended heatwave conditions and if there is adequate public respite areas.

It is noted that any commercial office development over 1000sqm within a mixed use building should be designed to achieve a NABERS Energy Rating of 5.5 Stars or better. 6 star NABERS Energy Commitment Agreements should be required for any commercial office space over 1000sqm in any buildings dedicated to commercial office space.

From an environmental outcomes perspective, development of the scale proposed could perform well if it is able to access precinct-scale environmental infrastructure such as a recycled water supply network, local organic waste processing or coordinated advanced waste separation and collection service opportunities, or local low/no carbon energy generation technology. Lodgement of the subject SSD proposal before an agreed planning framework for the larger Waterloo Estate Urban Renewal Area seriously constrains high performance outcomes that can be delivered through precinct scale solutions.

**11. Other**

Public Art

It is the City’s preference that a combined Metro/OSD public art approach is developed for the five stations in the City of Sydney local government area, with funds allocated for public art for the Metro and OSDs consolidated toward a single, curated public art strategy.

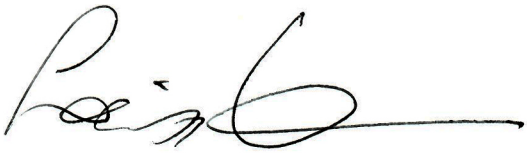
Community spaces

Community cohesion will be critical element of this development. Provision of community and social services spaces should be designed to support the wider Waterloo development and population needs. This includes (but not exclusive of other options) flexible community space, affordable and accessible health provision, wellbeing and mental health support, and other government services which are of critical need in the local area.

The City strongly advocates the need for clarity of a proposed operating model and the long-term sustainability of all community facilities on the site. There should be a commitment to ensuring that a sustainable funding and operating model is in place for all community assets in alignment with NSW infrastructure policy: “Drive high quality consumer-centric services and promote innovative service delivery models in infrastructure sectors.”

Should you wish to speak with a Council officer about the above, please contact Maria O’Donnell, Specialist Planner on 9265 9834 or modonnell@cityofsydney.nsw.gov.au

Yours sincerely,



**Louise Kerr**
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