

Attachment A

Summary of Submissions

Introduction

This submissions table provides a summary of the 54 submissions received during the public exhibition period of the Planning Proposal – 242-258 Young Street, Waterloo. Submissions are received from residents, a planning consultant representing an owners corporation, and 2 state agencies. 87% of submissions oppose the planning proposal. The government agencies and owners corporation that made submissions are listed below.

Individuals (51)
Government agencies (2)
NSW State Emergency Service
Department of Climate Change, Energy, the Environment and Water
Owners corporation (1)
Milestone (AUST) Pty Limited (Milestone) on behalf of Strata Plans 69746 and 71241 at 1-11 Hunter Street, Waterloo

Submission Position	Number	Proportion
Support	4	7%
Oppose	47	87%
Comment (do not support or oppose)	3	6%
Total	54	100%

It is noted Council approval of the Planning Proposal is not recommended, owing to flooding risks associated with a sensitive land use such as a school. As such, the City has not prepared a response to submissions where they do not relate to flooding.

Summary of submission	Response
Flooding (22 submissions, including 2 submissions from public authorities)	
<i>Public authority submissions</i> The City received submissions from NSW State Emergency Service and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) raising objection to the planning proposal. SES NSW states that <i>“there are significant flood hazard risks associated with the site which are unlikely to be adequately removed by redesigning the proposed development, and we therefore do not consider an educational facility for children to be a suitable use of the site.”</i> The submission from DCCEEW states <i>‘the site is not considered suitable for the proposed development which is a sensitive land use, and design changes would not be sufficient to mitigate flood risks.’</i> These submissions are provided at Attachment B to the post exhibition report. They provide further detailed explanation to support their position. <i>Submissions from individuals and an owners corporation</i> Twenty submissions, including one from an owners corporation, raise concerns about the flood risks associated with the proposed development, particularly the impact on Hunter Street and surrounding areas. The area is prone to significant flooding due to its original geography, with recent heavy rainfall resulting in submerged vehicles and stranded traffic. Concerns are raised about the inadequacy of the current flood assessment and the lack of effective mitigation measures in the Site-Specific Design Guide.	Following consideration of submissions, it is recommended that this planning proposal not proceed, owing to flooding risks associated with a sensitive land use such as a school.

Summary of submission	Response
a) Inadequacies in the Flood Assessment Submissions note that the Flood Assessment (WMA Water, January 2024) does not fully address the extent of flooding impacts, including the sag point on Hunter Street and the absence of specific flood mitigation measures in the Site-Specific Design Guide. b) Existing Flooding Issues Key concerns include severe flooding on Hunter Street during heavy rain, blocking traffic and limiting access, flooding on McEvoy Street causing significant disruptions. c) Need for Stronger Flood Mitigation Measures Submissions call for a more thorough flood impact assessment, mandatory flood mitigation strategies in the Site-Specific Design Guide, a flood management strategy with increased stormwater detention and improved drainage, and assurance that flood risks are fully addressed before development approval.	
Traffic and transport (40 submissions)	
Forty submissions, including one from an owners corporation, raise concerns about the impact of the proposed school on traffic congestion due to increased car, bus, and pedestrian activity on Hunter, Young, and Powell Streets. Specific concerns focus on student drop-off and pick-up, with insufficient on-site capacity potentially causing vehicle queuing and worsening congestion. d) Inadequacies in the Traffic Study Submissions raise concerns that the traffic study fails to adequately assess the proposal's traffic and transport impacts, including: • Whether the surrounding road network can handle the volume of drop-offs and pick-ups for an 800-student school. • The study's neglect of the unique nature of school traffic, which causes peak-period congestion.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to traffic and transport.

Summary of submission	Response
• Cumulative traffic impacts from nearby developments, such as the Woolworths mixed-use development and projects in the Danks Street and Morehead Street precincts. • The impact on local businesses reliant on customer parking and foot traffic. • The failure to account for the reallocation of street parking for school traffic, which will worsen congestion. Submissions raise concerns that the proposed traffic and transport solutions are inadequate, specifically: • The proposed pedestrian crossings and footpath widening do not address the fundamental issue of increased congestion. • Proximity to public transport does not significantly reduce car usage, as many parents prefer private vehicles for student drop-offs, particularly for younger children. • Existing bus services in the area are already at capacity, and additional student commuters may lead to overcrowding and service delays. e) Local impacts of pedestrian and vehicle traffic The local road network is already heavily congested, particularly on Powell Street, where traffic flows into main roads such as Elizabeth Street and Bourke Road. The addition of school traffic, including the proposed pick-up/drop-off zone for private vehicles on Young Street, creates further delays and impacts local residents' ability to access their properties. Residents of the Sonoma apartment complex raise concerns that: • Increased traffic volumes from school-related pick-ups and drop-offs cause congestion at their driveway access, making it difficult for residents to enter or leave the property. • Noise pollution from additional vehicle movements and student congregation	

Summary of submission	Response
during peak times negatively impacts nearby residential buildings. • Short but intense bursts of traffic during drop-off and pick-up periods disrupt local businesses and frustrate residents already affected by congestion. The introduction of school bus parking, parent drop-offs, and teacher parking on Hunter Street further disrupts traffic flow in the immediate area, particularly affecting apartment residents and local businesses. Increased pedestrian activity on McEvoy, Hunter, and Powell Streets also leads to overcrowded footpaths and further impedes traffic flow during peak school hours. Reliance on Turruwul Park, Rosebery, for the school's sporting field requirements requires a 10–15 minute bus ride, adding to traffic congestion and contributing to environmental impacts. f) Road network issues The proposed school development introduces a concentrated increase in traffic, particularly on Young Street, Powell Street, and Elizabeth Street, which already experience high congestion levels. The traffic assessment does not adequately consider the short, high-intensity bursts of vehicle movement during school pick-up and drop-off times, which significantly affect traffic flows on surrounding arterial roads. Submissions raise concerns that: • Traffic congestion worsens on Powell Street and Elizabeth Street during peak school times, placing additional pressure on the local road network. • The proposed pick-up/drop-off zone on Young Street increases congestion near intersections with major roads such as Bourke Road and McEvoy Street.	

Summary of submission	Response
- Increased traffic from the new Woolworths development is not adequately accounted for in the traffic impact analysis, further compounding congestion issues. Hunter and Young Streets are already used as shortcuts by drivers avoiding traffic signals on Bourke and McEvoy Streets, and additional school-related traffic intensifies this issue. g) Traffic/pedestrian safety Unlike commercial or residential developments that generate steady traffic throughout the day, schools create short bursts of intense congestion, increasing frustration for drivers and risks for pedestrians. Submissions raise concerns about: - A higher risk of accidents due to increased traffic volumes on Young Street, Powell Street, and surrounding roads. - Insufficient mitigation of risks for students walking to school, as they must navigate high-traffic areas and potentially unsafe crossings. - Pedestrian congestion near the proposed pick-up/drop-off zone, which creates safety hazards, particularly for young children crossing busy streets. - Blocked driveway access for residents on the western side of Hunter Street and reduced freedom of movement due to increased traffic. - Negative impacts on traffic signal operations and pedestrian safety at key intersections near the school. - Potential interference with existing public bus operations from the proposed school bus zone on Hunter Street, increasing congestion and safety risks for pedestrians and cyclists.	
Privacy (25 submissions)	
25 submissions, including one from an owners corporation, raise concerns about the privacy	Noted.

Summary of submission	Response
impacts of the proposed school design, primarily in relation to 1–11 Hunter Street, Waterloo. Many of these apartments are single-oriented, with balconies directly facing the site. The owners corporation submission identifies that the proposed outdoor play areas on Levels 4, 5, and 6 will have direct sightlines into the private open spaces of Sonoma residents, particularly those in Buildings B and C. It argues that the Site-Specific Design Guide does not adequately address privacy impacts and requests that appropriate privacy measures be incorporated before the Planning Proposal progresses further. Submitters note that without significant design changes—such as increased setbacks, screening, and landscape buffers—the proposal results in unreasonable privacy impacts. They request that the draft Site-Specific Design Guide be amended to include these adjustments to protect residential privacy.	It is recommended that this planning proposal not proceed for matters unrelated to privacy concerns.
Overshadowing (38 submissions)	
38 submissions, including one from an owners corporation, oppose the proposed change in height due to overshadowing and loss of natural light. Most submissions raise specific concerns about overshadowing impacts on residential development on the western side of Hunter Street (1–11 Hunter Street), with many submitters referencing their apartment locations. Key concerns relate to overshadowing between 9am and 10am for three ground-floor apartments in Building B of the Sonoma Complex. These apartments currently receive sunlight only between 9am and 11am, meaning the proposal removes 50% of their existing morning solar access. Submissions argue this	Noted. It is recommended that this planning proposal not proceed for matters unrelated to overshadowing concerns.

Summary of submission	Response
outcome is unacceptable and requires a revised building envelope to preserve sunlight. Submissions from 1–11 Hunter Street also raise broader concerns about loss of natural light and sky views, noting these impacts extend across multiple apartments. One submission raises general overshadowing concerns on Young Street, while another highlights that the cumulative impact of increased height and bulk is not adequately assessed in relation to surrounding properties.	
Height and Floor Space Ratio (38 submissions)	
38 submissions, including one from an owners corporation, raise concerns about the proposed height increase from 15m to 25m and the corresponding increase in floor space ratio (FSR). Submitters oppose the scale of the development, arguing it deviates from existing planning controls and the area's established character. a) Inconsistency with Planning Controls Submitters note that current planning controls successfully maintain the amenity of the area by limiting building heights. They express concern that the proposed increase represents a significant departure from these controls and is inconsistent with surrounding residential buildings. Some submitters state they purchased their homes based on the existing height limits and would not have done so had the proposed increase been known. b) Impact on Streetscape and Built Environment Several submissions object to the proposed height, arguing it disrupts the established skyline and streetscape along Hunter Street. Submitters note that the proposal seeks alignment with future developments, such as the Woolworths mixed-use project, while disregarding the existing residential context.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns related to the height and floor space ratio.

Summary of submission	Response
Concerns are raised that the building will tower over surrounding properties and fundamentally alter the area's visual character. c) Overdevelopment and Increased Density Some submitters express concern that increasing the FSR intensifies the use of the site beyond what is appropriate for the area. They note the proposed building will accommodate 800 students, contributing to increased pedestrian and vehicle activity. Others highlight that the scale of the proposal does not align with surrounding residential buildings in terms of both physical size and student numbers. The owners corporation submission states that the excessive FSR results in overdevelopment of the site, creating a building mass inconsistent with the surrounding context. The added bulk and scale produce a visually dominant structure that overwhelms the adjacent public domain and nearby residences. d) Calls for Adherence to Existing Controls Many submissions call for the proposal to comply with the existing 15m height limit, arguing this better maintains the area's character and amenity. Some submitters suggest a lower-scale development would still deliver a functional school without the impacts associated with the increased height and FSR.	
Parking (17 submissions)	
17 submissions raise concerns about the impact of the proposed development on parking availability in the area. Submitters note that street parking is already at capacity due to Council-imposed restrictions on parking within apartment buildings, high residential demand, and use by visitors and local workers. The development will further reduce available parking while increasing demand, particularly for school drop-off and pick-up. e) Insufficient Existing Parking	Noted. It is recommended that this planning proposal not proceed for matters unrelated to parking concerns.

Summary of submission	Response
Submitters raise concerns that the area already lacks sufficient parking, including: • Street parking is at full capacity throughout the week, with residents, Woolworths shoppers, and workers competing for limited spaces. • The removal of time restrictions has increased demand for on-street parking. • Many local residents do not have private parking and rely on street parking, which is already difficult to secure within a reasonable distance. f) Increased Demand and Reduced Availability Submitters note the development will increase parking pressure while removing existing spaces, including: • The proposal provides only 55 car spaces for a 10,608 sqm development, significantly below the 141 spaces required under current codes. • No additional parking is allocated for the film school, library, or café. • Designated drop-off and pick-up zones will reduce on-street parking while increasing demand for short-term parking. g) Impact on Residents and Businesses Submitters raise concerns about the effect of increased parking demand on local residents and businesses, including: • Residents who rely on street parking will face greater difficulty securing spaces due to increased demand from school-related traffic. • The high-density nature of the development, combined with the increased Floor Space Ratio (FSR), will further intensify parking pressure. • Local businesses, particularly those reliant on customer parking and foot traffic, may be negatively impacted by the reduction in available on-street parking.	
Noise (37 submissions)	

Summary of submission	Response
37 submissions, including one from an owners corporation, raise concerns about noise impacts from the proposed school on residential amenity, particularly for apartments facing the site. Concerns relate to the elevated recreational areas, potential for seven-day operations, and inadequate noise mitigation measures. a) Seven-Day Operations Submitters are concerned that noise may extend beyond school hours due to: • Use of rooftop courts and recreation areas on weekends and during school holidays. • After-hours activities including performances, rehearsals, sports, and community events. • Lack of defined operational limits, creating uncertainty around periods of respite. b) Noise from the Rooftop Playground Submissions raise concerns that rooftop recreational areas will amplify noise due to: • Elevated location of playgrounds and sports courts, increasing transmission to nearby apartments. • Typical schoolyard noise (shouting, ball-bouncing) creating continuous daytime disturbance. • Noise travelling across and between apartment buildings, affecting a wider residential area. c) Inadequate Noise Mitigation Measures Submissions argue that the Site-Specific Design Guide (Ethos Urban, January 2024) lacks adequate noise controls, specifically: • No enforceable noise mitigation to protect amenity. • Insufficient noise attenuation strategies to address ongoing school activity. • Need for barriers or screening to reduce sound transmission to adjacent residences. The owners corporation submission requests inclusion of specific noise controls in the design	Noted. It is recommended that this planning proposal not proceed for matters unrelated to noise concerns.

Summary of submission	Response
guide to ensure implementation during detailed design. d) Noise Echo and Amplification Submitters note the built form may worsen noise impacts due to: • Alignment of apartment buildings creating an “echo chamber” effect. • Rooftop noise reflecting off surrounding high-density buildings, affecting upper-level units. • Cumulative impact of school, traffic, and environmental noise increasing overall sound levels. e) General Noise from Arrivals and Departures Concerns are raised about noise from: • Large student groups during morning and afternoon transitions. • Parents and guardians gathering nearby during pick-up/drop-off. • School bells, announcements, and other operational noise disrupting residents. f) Proximity to Residential Apartments Submissions emphasise that: • The school’s direct adjacency to residential apartments makes noise mitigation critical. • Many residents work from home or occupy their homes during the day, increasing disruption. • High-density surroundings mean more residents are impacted than at typical school sites. Residents request enforceable noise mitigation, operational limits on seven-day activity, and a review of rooftop recreational areas to reduce ongoing noise disturbance.	
Hours of operation (10 submissions)	
10 submissions, including one from an owners corporation, raise concerns that proposed	Noted.

Summary of submission	Response
after-school activities and weekend use will extend impacts beyond standard school hours.	It is recommended that this planning proposal not proceed for matters unrelated to concerns about the hours of operation.
Other concerns	
Safety	
A submission raises safety concerns about co-locating the film school with the K–12 school, suggesting children could be endangered by film school attendees. Another submission raises concerns about student safety in a high-density residential area already affected by significant traffic congestion.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to safety concerns (not including those safety concerns relating to flooding).
Waterloo oval	
One submission raises concern that school use of Waterloo Oval could limit access for the broader community.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about added pressure on Waterloo Oval.
Light pollution	
A submission expresses concern about increased light pollution from the rooftop sports area, noting that this will worsen existing issues from nearby buildings and streetlights and impact residents' ability to sleep.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about light pollution.
Site suitability	
Six submissions raise concerns about the suitability of the site, questioning the need for a new school given another is being built 800 metres away in Green Square. Submitters note the area's demographics and lack of green space, arguing the site is too constrained. Concerns are also raised about the reliance on rooftop sports courts and increased building height as further evidence of the site's limitations. Alternative locations such as the Waterloo Estate or sites closer to public transport are suggested as more appropriate.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about the need for a school or the reliance on rooftop sports courts.
Cumulative impacts	

Summary of submission	Response
Three submissions raise concerns about the cumulative impact of this and other large-scale developments in Waterloo, Redfern, Alexandria, and Zetland. Submitters feel the proposal does not properly consider broader overdevelopment and its effect on residents' wellbeing.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about the cumulative impact of overdevelopment.
Trees, Tree Canopy, and Impacts on Wildlife	
6 submissions raise concerns about the loss of tree canopy and green space, which conflicts with the City of Sydney's goal to increase urban greenery. The removal of mature trees and introduction of taller buildings may reduce local wildlife habitat.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about the loss of tree canopy and green space.
Access to through-site link 2-4 Powell Street Waterloo	
3 submissions raise concerns about increased foot traffic through 2–4 Powell Street, citing safety risks, disruption to residents, and overcrowding of the pocket park and through-site link. Submitters note that directing students toward Green Square Station may lead to litter, footpath damage, and congestion, affecting the park's atmosphere and usability for residents.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about the through-site link.
Footpath widening impacts	
One submission raises concern about the impact of footpath widening setbacks, which could disrupt the current streetscape and pedestrian flow.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about footpath widening.
Environmental impacts	
One submission raises concern about the impact of footpath widening setbacks, which could disrupt the current streetscape and pedestrian flow.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about the environmental impact of development.
Precedent for future development	
One submission raises concern that approving the proposed height increase may set a precedent for future developments, leading to	Noted. It is recommended that this planning proposal not proceed for matters unrelated to noise

Summary of submission	Response
further out-of-scale buildings that negatively affect the area's character and quality of life.	concerns about precedent for future development.
Local infrastructure and amenities	
2 submissions raise concerns about the strain on local infrastructure, particularly overcrowded bus services and inadequate parking. Submitters suggest improving public transport, including light rail options, and enhancing pedestrian safety with narrower streets and more crossings.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about insufficient infrastructure.
Public Access	
One submission raises concern that the Planning Proposal does not require public access to the school.	Noted. It is recommended that this planning proposal not proceed for matters unrelated to concerns about public access.