

Submission on the Waterloo Estate (South) Concept Proposal

Counterpoint Community Services

Factory Community Centre

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Attention: Jude Urbanik

Department of Planning, Housing and Infrastructure

Application: Waterloo Estate (South) Concept SSDA (SSD-93222706)

Counterpoint Community Services makes this submission as a long-standing community service provider operating within the Waterloo Estate and surrounding area, with continuous involvement across multiple stages of the Waterloo Renewal process.

The submission draws on:

- previous formal submissions and correspondence lodged by Counterpoint Community Services, and
- day-to-day operational experience supporting residents through relocation, disruption, and system change, and
- evolving community feedback received during and beyond statutory consultation periods.

Counterpoint is known for professional, practical commentary grounded in lived experience — and for speaking plainly when plain speaking is required. This submission is written in that spirit. It acknowledges genuine improvements and the complexity of the task. Still, it is also direct about what remains missing, because the consequences

of unresolved safeguards will fall most heavily on existing public housing residents over a long period of staging.

The purpose of this submission is to identify the matters that must be secured at the Concept SSD stage through enforceable planning controls, rather than deferred to later processes that many affected residents will be unable to access equitably over time.

It distinguishes between matters of aspiration and matters requiring certainty through conditions and planning controls.

Executive Summary

This submission supports, in principle, the renewal of the Waterloo Estate (South) and acknowledges that the current Concept Proposal reflects meaningful improvements in several respects, including public-domain structure, mixed-tenure planning, and recognition of social impacts. However, key social safeguards remain unsecured at the only stage where they can be reliably fixed through planning controls.

The central issue for the consent authority is not whether renewal should occur, but whether essential social infrastructure, built-form safeguards, staging protections, and governance arrangements will be secured now or left to future processes that many affected residents will not be able to access equitably over time. In Counterpoint's view, deferring these matters would create foreseeable and avoidable harm.

Counterpoint therefore recommends that consent, if granted, be conditioned to secure at least the following matters at Concept SSD stage: a dedicated community centre anchored to the central civic space; early delivery triggers for social infrastructure and usable open space; clear accessibility and social-protection measures during works; safeguards for solar access, amenity, and safety in key public areas; and an ongoing governance mechanism with accountability beyond approval.

Without these safeguards, the proposal risks repeating a familiar pattern in which social impacts are acknowledged in assessment material, but mitigation is deferred to design later, operational, or engagement processes. That approach is not adequate for a long-staged public-housing renewal affecting residents who are disproportionately older, disabled, unwell, digitally excluded, or already carrying consultation fatigue.

While many matters can be appropriately refined at later stages of the development application, those dependent on land allocation, spatial configuration, staging logic, and governance structures cannot be effectively secured once the Concept SSD parameters are fixed.

For that reason, this submission does not ask the consent authority to revisit settled questions. It asks the authority to use the Concept SSD decision to lock in the social conditions required to make renewal workable in practice.

These recommendations are also consistent with and necessary to give effect to the commitments and directions outlined in earlier Social Sustainability work prepared for the project, which are not currently secured through the Concept Proposal.

Context and Basis of the Submission

- long-term presence and relationships
- daily engagement with residents across ages, tenures, and cultural backgrounds
- close working relationships with other community organisations and services
- practical responsibility for responding when systems fail or gaps emerge

This position enables Counterpoint to hold and relay diverse community views while applying professional judgement informed by experience, accountability, and evidence.

Counterpoint Community Services strives to act impartially and apolitically in engagement with planning processes, focusing on long-term community outcomes. Any government or non-government funding received by Counterpoint does not influence the views expressed in this submission.

What This Submission Is — and Is Not

This submission is:

- **Not an objection to renewal** — the community has long accepted that renewal of the Estate will occur.
- **Not a rejection of compromise** — residents and services have already accepted substantial density, physical change, prolonged disruption, and loss.
- **Not a repetition of aspirational requests** — it focuses on what must be secured to avoid foreseeable harm.

Refurbishment versus demolition is part of the community debate.

Counterpoint also notes that a consistent strand of community commentary argues that renewal should prioritise *retention and refurbishment* of existing homes where feasible, rather than wholesale demolition and rebuild. This view is often driven by concern about disruption, embodied carbon and waste, heritage and place attachment, and the risk that promised social benefits do not materialise once demolition is locked in.

While this submission primarily addresses what must be secured *within the current Concept SSD pathway* to prevent foreseeable harm, the consent authority should ensure that refurbishment/retention options and their social, environmental, and cost

implications have been transparently assessed and communicated, including why particular buildings or approaches are considered unsuitable for upgrade.

This submission does:

- document what the community has argued for and why
- acknowledge what was accepted or not achieved
- identify commitments and expectations reasonably relied upon through consultation
- assess what is missing or diluted in the current Concept Proposal
- explain why deferral creates predictable and preventable harm
- provide Counterpoint's professional assessment, informed by long-term service delivery experience and evidence from comparable public housing renewal processes in NSW and nationally

Evidence and Basis for This Submission

The evidence base for this submission includes:

- Previous written submissions lodged by Counterpoint Community Services at multiple stages of the Waterloo Renewal process
- sustained participation in government-led consultations and briefings relating to Waterloo South, Central, and North; collaboration with partner NGOs through the Groundswell coalition and the Waterloo Human Service Collaborative; and engagement with the resident-led redevelopment group
- direct engagement with residents before, during, and after consultation periods
- operational experience supporting residents through relocation, construction disruption, and system change
- analysis of the current Concept Proposal, Social Impact Assessment (SIA), and supporting technical material
- repeated observation of outcomes in comparable estate renewal contexts where social commitments were not secured at the approval stage

This submission is informed not only by *planned outcomes* but also by what happens over long timeframes as plans meet reality.

What the Proposal Gets Right

Where the Current Plan Reflects Earlier Community Views

Across multiple consultation rounds, community views — in the main (though not universally) — evolved from opposition to redevelopment in principle to conditional engagement focused on *how* renewal would occur and what protections would be put in place. The current Concept Proposal reflects this shift in several respects.

Acceptance of Renewal

The plan reflects that renewal of the Estate would proceed and builds on this acceptance rather than re-litigating its necessity.

Mixed-Tenure as a Core Principle

Sustained community commentary advocated for mixed tenure to avoid repeating the isolation of mono-tenure estates. Early government settings reflected a predominantly private-market model (approximately 70% private, 30% social housing). In response, community stakeholders consistently argued for a more balanced one-third social, one-third affordable, one-third private approach. The current proposal represents a partial improvement and a shift toward that position, but not full alignment. It also does not clearly demonstrate a robust “pepper-potting” approach to tenure distribution within and across buildings.

Retention of Social Housing On-Estate

Earlier submissions strongly opposed dispersal-led approaches. Retaining social housing within the Estate addresses this concern; however, losing public housing tenure in favour of a community housing-only model reduces housing choice.

Improved Built Form and Public Domain Consideration

Earlier iterations raised concerns about scale, bulk, and amenity. The current proposal shows improvements in open-space provision and built-form transitions. While opinions differ, consultation materials and stakeholder submissions recognise that this is an improvement on prior schemes.

Acknowledgement of Social Impacts

The inclusion of an SIA reflects longstanding community advocacy that redevelopment impacts extend beyond physical design and is welcomed.

Appendix EE (Social Impact Assessment) identifies multiple High and Very High negative social impacts in the absence of mitigation and relies primarily on mitigation measures deferred to future design, governance, and operational processes, reinforcing the need for key social safeguards to be secured at the Concept SSD stage rather than assumed through later delivery.

What Remains Unsecured

Despite these improvements, several matters consistently raised in earlier submissions remain unresolved within the statutory planning framework and continue to rely on later design, funding, governance, or operational decisions.

Consistency with Earlier LAHC Commitments

Earlier Social Sustainability work prepared for the Land and Housing Corporation (LAHC), including the 2020 Social Sustainability Report, set out specific place-based findings and commitments to support socially sustainable renewal at Waterloo South. These included a clearly scoped, multipurpose community centre of defined scale; early, staged delivery of social infrastructure; provision of community facilities and service capacity at each stage of development; and governance arrangements to support coordinated service delivery and ongoing community participation.

While the current Concept Proposal reflects these themes at a high level, it does not secure them through enforceable planning controls at the Concept SSD stage. In particular:

- the commitment to a dedicated community centre has shifted to broader and less definitive references to “community facilities”, without a secured location, scale, or delivery timing;
- early delivery of social infrastructure, previously framed as critical to managing disruption, is not tied to clear staging triggers or conditions;
- continuous provision of facilities and services across development stages, including temporary or interim arrangements, is not explicitly required; and
- governance and cross-agency coordination mechanisms, identified as essential to managing long-term social outcomes, are not secured beyond the approval stage.

This represents a material shift from earlier positions communicated through consultation and supporting documentation. Those earlier positions contributed to a reasonable expectation among residents and service providers that core social infrastructure, service continuity, and governance arrangements would be delivered as integral components of renewal, rather than remaining contingent on future design, funding, or operational decisions.

In this context, the Concept SSD stage provides the primary opportunity to translate those earlier commitments into binding requirements. Where this does not occur, there is a risk that previously identified social safeguards will be progressively diluted or deferred, with impacts falling most heavily on existing residents over the extended redevelopment period.

Community Infrastructure as Essential Social Infrastructure

While community uses or facilities are referenced, the Concept Proposal does not secure a dedicated community centre as fixed, load-bearing social infrastructure with a defined purpose, location, delivery timing, tenure, or operational capacity. The term *'facility'* is materially broader than and not equivalent to a community centre. It can describe a wide range of spaces without securing the specific civic, visible, staffed, and community-serving role that a dedicated centre performs.

A Community Centre Anchoring the Central Park

Earlier visioning consistently presented Central Park as the civic and social heart of the Estate, anchored by a community centre. While the park remains, there is no requirement for the social infrastructure intended to animate and sustain it. Many residents and community organisations experience this as a loss of function rather than a refinement.

Continuity of Trusted Community Providers

Earlier submissions emphasised that facilities are effective only when operated by trusted, established organisations. The proposal remains largely silent on operation, governance, or security of tenure.

Operating (People) Costs

Buildings alone do not mitigate social impact. Operational presence — staff, programs, governance — is critical, particularly during periods of disruption. These elements are not secured.

Estate-Wide Planning Perspective

Waterloo renewal was framed as a whole-of-estate transformation. Assessing the adequacy of community infrastructure solely within Waterloo South risks under-provision as Central and North progress, and is a short-sighted and potentially costly approach.

Cumulative and Long-Term Impacts

While disruption is acknowledged in the SIA, impacts are framed as temporary or precinct-specific, without enforceable safeguards against cumulative harm.

Governance and Accountability Beyond Approval

Engagement is strong pre-approval, but the proposal does not secure governance mechanisms once consent is granted — a recurring concern raised in earlier submissions.

Mixed-Tenure Complexity, Tenure Equity, and Long-Term Governance

The Concept Proposal adopts a mixed-tenure model but does not adequately address the practical complexities it creates over time. Mixed development is not only a design condition; it is an ongoing governance and operational condition.

The scale of the proposed redevelopment is material. The Concept Proposal provides for approximately 3,300 dwellings, including a minimum of 30% social housing, with the balance comprising affordable and private-market housing. This represents a substantial increase in private-market presence within the estate and reinforces the importance of securing clear, enforceable arrangements to ensure tenure equity, a consistent resident experience, and coherent governance across the precinct over time.

The interaction among public housing, community housing, and private-market housing introduces multiple ownership, management, and regulatory frameworks operating within the same precinct. In practice, this can result in fragmented accountability, inconsistent standards, and unequal resident experience across tenures.

Differences between public housing and community housing tenure are also material. Replacing public housing dwellings with community housing alone changes not only landlord identity but also the nature of the tenancy experience, including rent-setting, transfer pathways, and perceived security. Retaining dwelling numbers does not in itself preserve tenant choice or tenure equivalence.

The proposal is also largely silent on how shared spaces, facilities, and interfaces between tenures will be governed over time. In mixed-use and multi-stage redevelopment, strata and body corporate arrangements can play a decisive role in determining:

- access to and control of shared spaces
- maintenance standards and funding responsibilities
- the position of community-serving uses within predominantly residential developments
- the ability of vulnerable residents to navigate decision-making structures

Without early clarity, these arrangements can unintentionally entrench unequal access, reduce the viability of community uses, and shift power away from residents and existing trusted community organisations.

In addition, while the redevelopment introduces significant new private-market housing, it is unclear whether these dwellings serve as a genuine housing option for existing social housing tenants. Mixed tenure should not result in higher-amenity or higher-profile buildings being structurally inaccessible to the very residents whose displacement underpins the renewal process.

Finally, Waterloo South should not be treated as a socially self-contained precinct. As Waterloo Central and North are developed, governance systems, public spaces, and community infrastructure will operate across an interconnected estate. Without a whole-of-estate approach to tenure mix, governance, and infrastructure access, there is a risk of cumulative fragmentation rather than integration.

Accordingly, mixed tenure renewal requires not only spatial integration but also clear, enforceable arrangements to ensure tenure equity, coherent governance, and consistent access to amenities throughout the redevelopment. Where affordable housing is proposed, it should be secured as affordable housing in perpetuity and managed by a registered community housing provider. Time-limited affordability risks a gradual loss of affordable dwellings, particularly in high-value inner-city locations, and would undermine the long-term social objectives that justify redevelopment.

Why These Matters Must Be Resolved at the Concept SSD Stage

Community infrastructure — particularly a community centre run for and by the community — is not ancillary or discretionary. It is an essential social infrastructure underpinning the proposal's stated social objectives.

What the Community Has Consistently Argued

Across consultation phases and submissions, residents and local organisations consistently argued that:

- Community facilities are critical to daily life, not optional amenities
- A community centre adjoining or fronting the central park should function as the civic anchor
- infrastructure must be visible, accessible, and embedded
- facilities must be operated by trusted local providers with continuity and cultural competence

These positions are grounded in long-term service delivery experience.

What the Community Accepted — and Relied Upon

Residents accepted density, disruption, loss of existing spaces, and uncertainty about timing on the understanding that core social infrastructure and everyday safeguards would be preserved and strengthened.

The absence of a secure community centre is therefore experienced not as a minor refinement, but as a loss relative to what residents and local services reasonably understood renewal would provide.

Reasonable reliance matters

Repeated government-led engagement, published visioning, and staged decision-making created reasonable reliance that core social infrastructure would be delivered as part of renewal. Where a community has accepted density and prolonged disruption on that basis, it is not sound planning to treat those elements as optional once Concept SSD is approved.

Population uplift must be matched by infrastructure capacity.

Social infrastructure should be assessed against ultimate population and peak disruption demand, with clear delivery triggers tied to both, so that under-provision does not become permanent in practice.

What Was Promised or Implied Through Engagement

Government-led engagement is consistently framed:

- Central Park is the civic and social heart of the Estate
- Community Centre facilities are integral to supporting population growth and change
- social infrastructure as necessary to manage long-term impacts

These representations created reasonable expectations that core infrastructure would be secured through approval rather than deferred.

This distinction matters. References in engagement and planning material to *facility* or *facilities* are broader than, and do not themselves secure, a dedicated community centre. They may encompass multipurpose rooms, shared spaces, adaptable tenancies, or other community-compatible uses. Still, they do not guarantee the identifiable location, civic prominence, affordable tenure, trusted operation, and ongoing staffed presence that a community centre requires.

What Is Missing in the Current Proposal

The Concept Proposal does not move from broad facility language to a secured commitment to the specific infrastructure the community has consistently sought. In particular, it does not:

- require delivery of a dedicated community centre
- secure a health/community health facility that the community has also consistently advocated for
- specify a location aligned with the park's civic function
- secure early delivery
- identify or prioritise trusted operators
- ensure long-term affordable tenure
- mandate operational and staffing capacity

As a result, community infrastructure remains aspirational rather than secured.

Why Deferral Creates Harm

Deferral removes the very planning levers that can still secure location, land allocation, sequencing, and delivery triggers. During the early stages, disruption arrives before benefits, demand for support increases, and informal networks fracture. Once Concept SSD approval is granted, opportunities to require these safeguards narrow sharply.

Everyday Living Challenges and Design as Social Mitigation

A consistent theme across previous submissions has been the need for renewal outcomes to respond to the everyday lived conditions of public housing residents.

Many existing residents experience:

- ageing and declining mobility
- chronic illness and disability
- reliance on carers and visiting services
- exposure to antisocial behaviour and neighbourhood noise
- informal outdoor alcohol use driven by lack of safe alternatives
- limited access to welcoming, supervised outdoor space

These are baseline realities. Design either mitigates or exacerbates them.

Ageing in Place and Accessibility

Design decisions relating to gradients, lift access, distances between buildings, seating, shelter, and solar access determine whether residents can age in place. Poor design accelerates isolation and increases service dependency.

Antisocial Behaviour, Noise, and Alcohol Management

Antisocial behaviour and neighbourhood noise have been persistent concerns. These are intensified by environments lacking:

- passive surveillance
- clear sightlines
- well-lit and socially legible spaces
- designated, supported places to gather

In the absence of appropriate spaces, behaviours such as outdoor drinking are displaced into corridors, entrances, and parks, increasing conflict and reducing perceived safety — particularly for older residents. Design is therefore not neutral. It is a primary mitigation tool.

Amenity equity between tenures

Mixed-tenure renewal must not result in a two-tiered precinct in which social housing residents experience materially lower amenities than private residents. Amenity equity includes safe and legible entries, lift access, acoustic performance, storage and waste arrangements, onsite building management and security, access to communal space, and equitable access to usable open space and passive surveillance. These outcomes are shaped by Concept SSD parameters (envelopes, interfaces, setbacks, ground-plane activation, and staging) and therefore must be treated as a core social mitigation issue at this stage.

Built Form, Height, and Solar Access as Social Considerations

While increased height and density have been broadly accepted, their social consequences must be actively mitigated.

Height, Overshadowing, and Amenity

Taller buildings increase risks associated with:

- overshadowing of open space
- reduced winter solar access
- wind impacts
- reduced outdoor comfort

Compliance with minimum solar benchmarks does not guarantee that spaces function socially. For older residents and people with limited mobility, solar access determines whether open space is usable at all.

For this reason, decisions about height, massing, and setback are not neutral design matters. They directly determine long-term usability of open space and must be resolved with social mitigation in mind at the Concept SSD stage, rather than deferred to later design development.

Central Park as a Social Space

The Central Park's success depends on:

- adequate solar access
- integration with community facilities
- safety, visibility, and passive surveillance

A park that meets technical standards but is overshadowed or socially disconnected may comply on paper while failing residents in practice.

Why This Is a Concept SSD Issue

At the Concept SSD stage, decisions about height, massing, and setbacks determine long-term amenity outcomes. Once set, effective mitigation becomes difficult or impossible. Built form is therefore a core social planning issue, not a deferred design matter.

Social Impact Assessment — Acknowledgement Without Protection

The Social Impact Assessment marks an improvement in acknowledgement, but it does not, in itself, secure enforceable mitigation. It identifies high and very high risks, is scoped to Waterloo South, and relies heavily on future design, management, and engagement processes. For a long-staged renewal affecting residents with limited capacity to re-engage repeatedly, acknowledgement without conditions is not protection. At the Concept SSD stage, the consent authority can still secure the parameters that determine whether mitigation is feasible in practice.

Environmental Impact Statement — Scope, Strengths, and Limitations

The Environmental Impact Statement (EIS) submitted with the Waterloo South Concept State Significant Development Application is comprehensive. It provides detailed technical analysis across a wide range of environmental, urban design, and amenity considerations. It clearly establishes the Concept SSD as the planning framework that will fix building envelopes, maximum heights, setbacks, land-use distribution, and staging logic for future development.

This submission acknowledges the breadth and technical rigour of the material provided. The EIS confirms that the Concept SSD stage is the point at which key spatial and built-form parameters are established and that these parameters will guide all subsequent detailed design and delivery.

However, while the EIS identifies a range of social, amenity, and accessibility impacts, the way these impacts are addressed raises concerns relevant to Concept SSD decision-making.

The EIS includes dedicated chapters on social impact, accessibility, amenity, and urban design. However, many identified impacts are still treated as matters for later detailed design, management plans, or ongoing engagement. That approach assumes a continuing capacity for participation and adaptation that many existing residents lack over extended redevelopment timeframes.

Everyday living issues such as ageing in place, mobility, safety, noise, and open-space usability are assessed across multiple technical chapters but are often treated as separate technical matters rather than as interacting conditions of daily life. Likewise, built-form benchmarks are necessary but do not, by themselves, ensure that parks, streets, and communal areas will be usable, comfortable, and socially safe in practice.

The EIS also relies on engagement outcomes and community views in its assessment and project justification. As set out elsewhere in this submission, engagement for Waterloo South has occurred amid consultation fatigue, variable participation capacity, and reliance on desktop analysis. In this context, engagement outcomes cannot be treated as a substitute for structural mitigation secured through planning controls.

Accordingly, while the EIS provides necessary and detailed technical information, it does not demonstrate that the identified everyday living and social impacts are adequately mitigated at the Concept SSD stage. This reinforces the need for key social outcomes, built from safeguards and operational capacity, to be secured through enforceable planning conditions rather than deferred to future processes.

Mitigation and Management Measures

Appendix C to the Environmental Impact Statement consolidates a wide range of mitigation and management measures intended to address impacts associated with the Waterloo South redevelopment. The breadth of issues covered — including built form, wind, safety, amenity, noise, accessibility, traffic, flooding, construction, and heritage — demonstrates that potential impacts have been identified and considered across multiple technical disciplines.

However, Appendix C also makes clear that many mitigation measures are not secured at the Concept SSD stage.

With limited exception, mitigation is framed as:

- to be addressed at future detailed SSDA or DA stages,
- to be refined once final building designs are known, or
- to be implemented through future management or operational plans.

Appendix C explicitly notes that no physical works are proposed as part of the Concept SSDA and that mitigation is contingent on subsequent applications and approvals.

In practice, this means that while risks are acknowledged, responsibility for mitigation is largely deferred. For matters that directly affect everyday living — including solar access, wind comfort, safety, antisocial behaviour, noise, accessibility, and the usability of open space — the effectiveness of mitigation depends on future design development, engagement, and operational decisions that are not yet fixed or guaranteed.

This deferral has direct equity implications. As outlined elsewhere in this submission, many existing public-housing residents experience ageing, disability, illness, and consultation fatigue. The capacity to repeatedly engage in future planning and design processes over extended redevelopment timeframes is limited for many of those most affected. Where mitigation relies primarily on future participation or adaptive management, risk is effectively transferred from the planning system to residents and community services.

Appendix C, therefore, confirms a central concern of this submission: that identifying mitigation is not the same as securing it. While the proposed mitigation framework provides useful guidance, it does not, on its own, provide certainty that key social and everyday living impacts will be mitigated in practice.

At the Concept SSD stage, there remains an opportunity — and responsibility — to distinguish between mitigation measures that can be safely resolved later and those that must be structurally secured now through enforceable planning controls and conditions, particularly where impacts are predictable, cumulative, and experienced most acutely by vulnerable residents.

Accessibility of the Planning and Exhibition Process

Before the public exhibition of the Waterloo South Concept State Significant Development Application, Counterpoint Community Services formally raised concerns with the Department regarding the accessibility and impartiality of the proposed exhibition process for public housing tenants.

That correspondence acknowledged that the exhibition would proceed in accordance with statutory requirements. However, it identified a substantive and structural concern: standard State Significant Development exhibition processes do not, in

themselves, provide the resources or mechanisms required to ensure that public-housing tenants can meaningfully understand, engage with, and influence proposals of this scale and sensitivity.

The concerns raised were not framed as matters of intent or goodwill. They were explicitly identified as structural barriers inherent in proponent-led engagement models, including:

- digital exclusion and limited access to online systems
- literacy and language barriers
- disability, reduced mobility, and ageing
- redevelopment-related trauma and consultation fatigue
- lack of impartial explanation of complex, substantial planning material to be responded to in 28 days without any prior release.

In response, the Department acknowledged the importance of accessible and inclusive engagement. It confirmed that the exhibition would be undertaken in accordance with legislative requirements and the Department's Community Participation Plan. The Department further clarified that:

- Homes NSW, as the applicant, would lead the majority of public engagement and explanation of the proposal
- The Department's role would be limited to administering the statutory exhibition process and assessing submissions
- The Department could not comment on the merits of the proposal
- engagement format, timing, and location would remain the responsibility of the proponent

While these arrangements satisfy statutory exhibition requirements, they also confirm that accessibility is addressed procedurally rather than structurally.

For many existing public-housing residents — particularly those experiencing ageing, disability, chronic illness, or cumulative disruption — the capacity to repeatedly engage with complex planning processes over extended timeframes is limited. In this context, reliance on future engagement, meetings, or staged consultation as the primary means of resolving material issues places a disproportionate burden on those with the least capacity to participate.

This has direct planning implications. The Concept SSD stage is the point at which development scale, built-form parameters, spatial allocation, and staging logic are fixed. Where known accessibility barriers exist, deferring resolution of substantive social, design, and infrastructure issues is not neutral. It effectively shifts risk from the planning system onto residents and community services over time.

Accordingly, concerns raised during exhibition preparation reinforce the need for core mitigation measures — including social infrastructure, built-form safeguards, governance arrangements, and operational capacity — to be secured through binding conditions and planning mechanisms at Concept SSD stage, rather than relying predominantly on future participation processes that many residents will be unable to access in practice.

Community Engagement Outcomes — Scope, Limitations, and Weight

The Engagement Outcomes Report submitted with the Concept SSDA documents a substantial engagement effort undertaken by the proponent and its consultants, and this submission acknowledges that genuine attempts have been made to engage with the community within the parameters available.

However, the weight to be given to the engagement outcomes presented must be considered in light of the context in which engagement occurred, and the methodological limitations identified in the report.

The engagement outcomes must be considered in context. Waterloo South engagement has occurred after years of consultation, varying levels of trust, and limited translation of earlier concerns into secured outcomes. In that setting, lower participation or muted feedback cannot reasonably be read as reduced concern or support.

The report also relies significantly on desktop analysis, aggregated feedback, and proponent-led processes. That does not negate its value, but it does mean the record may reflect participation capacity as much as impact, particularly for tenants most affected by ageing, disability, disruption, or earlier experiences of unresponsiveness.

Accordingly, while the Engagement Outcomes Report provides useful context, it cannot be relied upon as evidence that social risks, everyday living challenges, or cumulative impacts have been adequately understood or mitigated. In particular, issues relating to ageing in place, accessibility, antisocial behaviour, neighbourhood noise, solar access, and the usability of open space during prolonged staging require structural responses through planning controls and conditions, not reliance on engagement outcomes alone.

This reinforces the central position of this submission: where engagement occurs in conditions of fatigue, limited trust, and unequal capacity to participate, planning decisions must place greater weight on securing mitigation through enforceable mechanisms at the Concept SSD stage, rather than assuming unresolved issues can be addressed through future engagement.

In social planning contexts, consistency of themes across service delivery, informal engagement, and operational experience is a recognised indicator of systemic risk, even where quantitative participation is uneven.

Community Consultation Table

Appendix D to the Environmental Impact Statement summarises the proponent's consultation activities with a range of stakeholder groups, including tenants, nearby residents, community organisations, Aboriginal stakeholders, and government agencies. The table sets out how each group was engaged, key topics of interest raised, and references to where those topics are addressed within the EIS and supporting appendices.

This submission does not dispute that consultation activities occurred or that a broad range of issues was identified. Indeed, the consultation table confirms that residents and stakeholders consistently raised concerns about built form, overshadowing, accessibility, community facilities, safety, noise, construction impacts, and service continuity — many of which align closely with issues raised in previous submissions by Counterpoint Community Services and the author.

However, the consultation table is a descriptive summary of engagement activity, not an assessment of whether identified concerns have been resolved, mitigated, or secured. Cross-references within the table link issues raised to sections of the EIS where they are discussed, but they do not demonstrate that outcomes are fixed through enforceable planning controls at the Concept SSD stage.

The table also does not interrogate participation conditions, including consultation fatigue, unequal capacity to engage, or the likelihood that some residents and service users disengage over time following earlier consultation rounds that did not secure outcomes. As a result, the consultation record reflects who participated, rather than ensuring that the impacts on those most affected have been structurally addressed.

Appendix D, therefore, usefully confirms the issues raised through consultation, but not that those issues have been resolved or secured. It reinforces the need for binding conditions rather than relying solely on consultation summaries.

Design Guide Assessment

Appendix E assesses the Concept State Significant Development Application against the Waterloo Estate (South) Design Guide. The assessment demonstrates that the proposal has been developed in accordance with the Design Guide's Urban Strategy principles, including land-use mix, built-form hierarchy, public space provision, and staging.

This submission acknowledges that Appendix E provides a structured framework for assessing Design Guide alignment and that the proposal aligns with the intent of many Design Guide provisions.

However, Appendix E relies heavily on the capacity for Design Guide objectives to be achieved through future detailed design, reference schemes, and later development applications. In many instances, compliance is demonstrated on the basis that acceptable outcomes can be delivered rather than on the premise that they are secured through fixed parameters at the Concept SSD stage.

Of particular relevance is the treatment of matters that have clear social implications — including solar access to open space, wind comfort, safety and surveillance, amenity equity between tenures, and the usability of parks and streets over time. These matters are largely framed as technical or design quality considerations, rather than as determinants of whether spaces will function as safe, comfortable, and inclusive environments for existing residents, particularly older people and those with limited mobility.

Appendix E also acknowledges staged delivery and reliance on future applications to resolve detailed outcomes. However, it does not assess whether deferral of socially critical elements — such as well-located community facilities, early access to usable open space, or design features that mitigate antisocial behaviour and noise — is reasonable given known constraints on residents' capacity to participate in repeated future processes.

Accordingly, while Appendix E demonstrates alignment with the Design Guide's intent, it also reinforces a key concern of this submission: that Design Guide compliance alone does not guarantee socially workable outcomes unless critical parameters are secured through enforceable controls at the Concept SSD stage.

Public Domain and Landscape Report

Appendix J sets out the Public Domain and Landscape strategy supporting the Concept State Significant Development Application. The material demonstrates a coordinated approach to streets, parks, planting, deep-soil zones, and WSUD, and shows how public-domain elements can align with the Design Guide and the broader urban design framework.

This submission acknowledges, in principle, the quality of the landscape and public-domain strategy. The report illustrates how generous open spaces, tree canopy, and improved streetscapes could be delivered across the precinct over time.

However, as with other illustrative material submitted at the Concept SSD stage, Appendix J presents potential outcomes rather than secured ones.

The public-domain performance shown is highly dependent on built-form decisions, staging, and detailed design coordination that will occur in future applications.

Of particular relevance is the distinction between open-space provision and open-space usability. The report does not assess how factors such as winter solar access, wind exposure, seating, shelter, passive surveillance, and proximity to staffed community facilities will combine to determine whether spaces function as welcoming, safe environments in everyday use — especially for older residents, people with limited mobility, and those living through prolonged disruption.

The effectiveness of the public domain is also sensitive to staging. Where parks, streets, and open spaces are delivered late, temporarily constrained, or fragmented across stages, their intended social function can be significantly reduced for existing residents. These impacts cannot be fully remedied solely through landscape detailing.

Accordingly, while Appendix J provides important illustrative guidance, it reinforces the need for Concept SSD-level controls to secure not only the quantity of public open space, but also the conditions necessary for its social usability over time. This includes protecting solar access through height and envelope decisions, integrating with community facilities, and sequencing to ensure usable public space is available when disruption is greatest.

Crime Prevention Through Environmental Design (CPTED) Assessment

Appendix K provides a comprehensive Crime Prevention Through Environmental Design (CPTED) assessment prepared by Urbis in support of the Concept State Significant Development Application. The assessment applies the four CPTED principles of surveillance, access control, territorial reinforcement, and space and activity management, informed by analysis of local crime data, site observations, stakeholder engagement, and a block-by-block review of the concept proposal.

This submission acknowledges the depth of analysis undertaken and the recognition, within the CPTED assessment, of the specific safety- and crime-related challenges facing the existing Waterloo Estate. The absence of formal input from the NSW Police Force at this stage is of concern.

Given the identified safety challenges within the existing estate, consent should be conditioned to require a Safer by Design consultation with the NSW Police Force before finalising detailed building envelopes and public domain design, ensuring CPTED outcomes are informed by operational policing insights rather than design assumptions alone.

The report demonstrates that the concept proposal has incorporated design responses intended to address these challenges, including increased activation of the public realm, clearer sightlines, improved lighting, and a network of streets and open spaces designed to support passive surveillance.

However, the CPTED assessment is explicitly undertaken at the Concept SSDA stage and relies heavily on future detailed design, place management, and operational decisions to deliver the identified outcomes. Many CPTED measures — particularly those relating to activation, supervision, lighting, landscape treatment, and programmed use of spaces — are to be refined, assessed, and implemented through subsequent development applications and management plans.

For existing residents, particularly older tenants and those who already experience safety concerns, the effectiveness of CPTED is not theoretical. It depends on whether safe, visible, and socially legible spaces are delivered early, consistently activated, and supported by ongoing management over extended redevelopment periods.

In this context, reliance on future CPTED refinements presents risks similar to those identified elsewhere in this submission. Where safety mitigation depends on later design stages and operational arrangements, there is limited assurance that identified risks will be mitigated in practice once Concept SSD parameters — including building envelopes, heights, public-domain configuration, and staging — are fixed.

Accordingly, while Appendix K demonstrates that CPTED principles have been considered, it reinforces the need for Concept SSD-level controls and conditions to secure key safety-related outcomes, particularly in public spaces, community facilities, and areas used by vulnerable residents, rather than relying primarily on future refinement and management processes.

Design Excellence Strategy

The Design Excellence Strategy submitted with the Concept State Significant Development Application sets out the proposed processes to achieve architectural quality throughout the redevelopment of Waterloo South. The Strategy establishes how designers will be appointed, how competitive and non-competitive design processes will be applied across different tenures, and how design review will occur across multiple stages over a projected 10–15-year delivery period.

This submission acknowledges that the Strategy provides a clear framework for coordinating multiple architectural teams and promoting high design quality across a large and complex redevelopment. It also recognises that design excellence processes can contribute positively to architectural variety, material quality, and streetscape outcomes over time.

However, the Design Excellence Strategy is process-focused rather than outcome-focused. It does not address the spatial, built-form, sequencing, or operational parameters that determine whether everyday living outcomes — including solar access, open space usability, accessibility, safety, and service continuity — function effectively for existing residents during prolonged redevelopment.

The Strategy also relies on flexibility and adaptation over time, which is an understandable response to long-term staging. However, where key risks relating to ageing, accessibility, cumulative disruption, and loss of trust have already been identified, reliance on future design processes cannot substitute for safeguards secured through planning controls at the Concept SSD stage.

Accordingly, while the Design Excellence Strategy supports the pursuit of high-quality architectural outcomes, it cannot mitigate social or everyday-living risks arising from fixed planning parameters. These risks must be addressed through enforceable conditions and structural controls established at the Concept SSD stage, rather than deferred to future design excellence processes.

Staging, Sequencing, and Cumulative Impact

The documentation supporting the Concept State Significant Development Application indicates that redevelopment of Waterloo South will occur over an extended period, potentially spanning 10–15 years. It will be delivered in multiple stages, subject to change over time.

This submission acknowledges that long-term staging is inevitable for redevelopment at this scale. However, the way staging is addressed in the application material raises significant concerns relevant to Concept SSD decision-making.

While indicative staging and sequencing information is provided, the timing and order of delivery of key social mitigation measures — including usable open space, community facilities, safety infrastructure, and service continuity — remain flexible and largely deferred to future applications. There is limited assurance that these elements will be delivered early enough to mitigate the periods of greatest disruption experienced by existing residents.

For many residents, particularly older tenants and those living with disabilities or chronic illnesses, disruption over extended timeframes is not experienced as temporary. It becomes a defining condition of everyday life.

Where mitigation is delivered late, split across stages, or contingent on future approvals or funding decisions, cumulative impacts intensify rather than resolve.

Staging also has direct implications for the safety, accessibility, and usability of space. Public domain, parks, and pedestrian links that are fragmented, constrained, or delivered late cannot perform their intended social function during the stages when residents are most affected by construction impacts and neighbourhood change.

In this context, reliance on future staging refinement places disproportionate risk on residents with the least capacity to adapt or to re-engage repeatedly in planning processes over time. At the Concept SSD stage, the consent authority retains the ability — and responsibility — to require clear sequencing principles, delivery triggers, and the minimum early-stage provision of socially critical infrastructure.

A “social protection during work” package is required

Because disruption arrives before benefits, social mitigation must be front-loaded. Consent conditions should require a minimum “social protection during works” package, including: continuous accessible paths of travel; clear wayfinding; temporary seating/shelter on key routes; predictable arrangements for carers and service access; a responsive on-site presence during high-impact periods; and specific supports for older residents and tenants with disability or chronic illness when access, noise, or safety impacts spike. These are not add-ons; they are essential measures to prevent cumulative harm during long staging.

Accordingly, extended staging reinforces the need for enforceable conditions that secure social mitigation at the point of greatest impact, rather than deferring protections to later stages once disruption has already occurred.

Transport, Access, and Everyday Mobility

The Environmental Impact Statement and supporting technical material address traffic, transport, and access impacts associated with the redevelopment, including vehicle movements, public transport integration, walking and cycling connectivity, and servicing arrangements.

This submission acknowledges that the technical transport assessments indicate that the proposal can operate within acceptable performance thresholds when measured against standard traffic and transport criteria. However, technical acceptability does not, of itself, resolve the everyday mobility and access challenges experienced by existing residents.

For many current residents — particularly older people, those with disability or chronic illnesses, and households reliant on carers or visiting services — everyday mobility depends on short distances, clear and legible routes, safe crossings, reliable lift access, and proximity to public transport stops.

These conditions are sensitive to changes in road layout, block permeability, construction staging, and temporary access arrangements over extended periods.

Changes to the internal road network also require careful scrutiny. Previous Waterloo planning iterations attracted strong community concern when internal streets were proposed to connect more directly to McEvoy Street, particularly due to the potential to increase through-traffic, reduce residential amenity, and create additional safety risks for pedestrians and vulnerable residents. The current Concept Proposal should therefore clearly demonstrate that internal streets are designed primarily for local access, safety, and legible movement rather than functioning as through-traffic corridors linked to major arterial roads. If the Concept framework could facilitate any future road connection to McEvoy Street, that possibility should be transparently assessed for traffic, safety, and amenity impacts rather than treated as a neutral network refinement.

Parking Provision and Equity Considerations

Parking provision remains a significant concern for many existing residents. Community feedback consistently identifies current shortages of on-street and off-street parking, challenges associated with visitor and carer access, and competition for limited spaces within and around the Estate. These pressures are expected to intensify as redevelopment progresses and residential density increases.

This submission recognises that contemporary planning policy prioritises reduced car dependence, increased use of public transport, walking, and cycling, and alignment with broader climate and sustainability objectives. These policy settings are well established and not disputed.

However, reduced parking provision cannot be treated as a neutral or purely technical outcome in this context. For many existing public housing residents — including older people, residents with mobility limitations, households reliant on carers or support workers, and those with medical or service-related travel needs — access to a vehicle remains an essential component of everyday functioning. Mode-shift assumptions do not apply equally across the population, particularly when physical ability, health status, caring responsibilities, or safety concerns limit alternative options.

Community concern regarding parking is therefore not a rejection of climate objectives, but a reflection of lived conditions and practical need. Where parking provision is reduced without clear, enforceable safeguards, the burden of adjustment falls disproportionately on those with the least capacity to absorb it.

In a long-staged redevelopment, parking stress can also change form over time as construction activity reduces available spaces, modifies street layouts, and alters access arrangements. Without clear Concept-stage parameters, parking impacts risk compounding alongside other pressures on accessibility, safety, and disruption.

Accordingly, parking must be considered as part of everyday mobility and social equity at the Concept SSD stage. This includes ensuring that parking strategies and ratios account for existing resident needs, visitor and carer access, and the cumulative effects of increased density and extended staging, rather than relying solely on future operational plans or generalised mode-shift outcomes.

In addition, future parking provision should account for the transition to electric vehicles. As residential developments increasingly require EV-ready infrastructure, parking areas should be designed with sufficient electrical capacity and staged charging provision so that residents — including social and affordable housing tenants — are not excluded from access to emerging transport technologies. This is both a future-mobility issue and an equity issue.

The application material largely treats transport impacts as operational matters to be managed through future detailed design, construction management plans, and travel demand measures. While appropriate in principle, this approach does not adequately address the cumulative effects of prolonged disruption on those with limited capacity to adapt to changing routes, temporary closures, or reduced accessibility during staging.

Parking and access provisions should explicitly account for essential service delivery, including provision for carers, health workers, and community service providers. This may include dedicated spaces, priority allocation, or permit/pass systems to ensure reliable access, particularly during construction and periods of disruption.

Transport impacts also intersect directly with safety and well-being. Changes to pedestrian routes, lighting, surveillance, and street activation during redevelopment can affect perceptions of safety and the willingness to move through the precinct — particularly at night or during construction. For vulnerable residents, perceived safety can be as determinative as physical access.

At the Concept SSD stage, key spatial and sequencing decisions — including street network configuration, location of through-site links, access to public transport, servicing arrangements, and staging priorities — are being set. Where these decisions shape long-term accessibility and everyday mobility, reliance on future management alone is insufficient.

Accordingly, transport and access considerations reinforce the need for Concept SSD-level conditions that secure:

- safe, direct, and accessible pedestrian routes throughout all stages,
- continuity of access for residents, carers, and services,
- early delivery and protection of legible movement networks,

- and staging arrangements that minimise cumulative access barriers rather than merely managing them once they arise.

Aboriginal Cultural Heritage and Designing with Country

The Environmental Impact Statement includes material addressing Aboriginal cultural heritage and Designing with Country principles, informed by consultation with Aboriginal stakeholders and organisations. This submission acknowledges the importance of that work and recognises the central role of Aboriginal connection to Country within the Waterloo Estate.

The documentation demonstrates a clear commitment to recognising Country, embedding cultural narratives, and continuing engagement with Aboriginal stakeholders as the project progresses.

However, at the Concept SSD stage, it is important to distinguish between commitment to the process and confidence in the outcome.

While Designing with Country principles are articulated, the delivery of culturally appropriate spaces, gathering places, and visible expressions of Country is largely deferred to future design stages, reference schemes, and ongoing engagement. The Concept SSDA does not yet secure the spatial allocation, sequencing, or governance arrangements necessary to ensure these outcomes are delivered consistently across stages and over time.

Of particular significance is the reliance on a detailed future design to translate cultural principles into built and operational form, at a point when key parameters — including park locations, land dedication, building envelopes, and staging — will already have been set. Once those parameters are set, opportunities to meaningfully embed Aboriginal cultural outcomes can be constrained, even where intent remains strong.

For Aboriginal tenants, service providers, and community members, continuity of connection to Country is not episodic. It is shaped by access to land, visibility within public space, safety, and the ability to gather in culturally appropriate ways throughout prolonged redevelopment.

Accordingly, while the Aboriginal cultural heritage and Designing with Country material provide a strong foundation, they reinforce the need for Concept SSD-level controls to secure—not merely signal—the spatial, design, and governance conditions required to deliver Aboriginal cultural outcomes in practice.

Community Issues Raised During the Exhibition and Engagement

Counterpoint Community Services and the author continue to receive community feedback during and following the exhibition period, including through direct service contact, informal conversations, and follow-up engagement with residents who may not participate in formal submission processes.

This section highlights recurring themes emerging through service contact and informal follow-up. It is included as confirmatory evidence of lived experience and operational knowledge, not as a statistically representative survey.

Accessibility and Ageing in Place

Community feedback continues to emphasise concerns regarding:

- increasing difficulty accessing services and amenities
- design features that may exacerbate mobility limitations
- distances between buildings, lifts, and open spaces
- loss of familiar, proximate places that support ageing in place

Residents consistently describe accessibility as cumulative: long staging, greater distances, and disrupted routes compound mobility challenges rather than resolve them.

These are not minor operational details; they are shaped by built-form, public-domain, and staging decisions fixed at the Concept SSD stage.

Safety, Antisocial Behaviour, and Neighbourhood Noise

Residents continue to raise concerns regarding:

- perceived safety during both day and night
- unmanaged or displaced antisocial behaviour
- neighbourhood noise and conflict during extended construction periods
- lack of safe, socially supervised spaces for informal gathering
- Poor management of the estate's outdoor spaces and streetscapes
- Unresponsive and subpar maintenance system of properties

Feedback consistently links these issues to design, surveillance, lighting, management responsiveness, and the availability of staffed community facilities.

Use and Usability of Open Space

Community feedback indicates that:

- The presence of open space alone does not guarantee use
- solar access, shelter, seating, and visibility are critical
- overshadowed or windswept areas are functionally unusable for many residents, particularly older people
- recent public commentary and campaigning material circulating in the community echoes some of these concerns; it is noted here for balance and to reflect the broader range of community voices, without adopting or endorsing any particular campaign framing

Residents repeatedly stress that technical compliance alone will not produce spaces that feel safe, comfortable, or welcoming in everyday use.

Construction Fatigue and Cumulative Impact

Residents consistently identify cumulative disruption as a major concern, including:

A further recurring theme (including in recent public commentary) is that the preferred approach should be “don’t demolish — refurbish”, reflecting the view that upgrading existing stock could reduce displacement, shorten disruption timeframes, and avoid unnecessary waste. Whether or not that approach is adopted in full, it reinforces the importance of minimising disruption, front-loading protections, and not deferring critical social infrastructure and governance commitments.

- prolonged noise, dust, and restricted access
- repeated change and uncertainty
- erosion of informal support networks over time

Many residents report a reduced capacity to engage with planning and engagement processes amid ongoing disruption.

For older residents and tenants with chronic illness or disability, disruption that extends over many years is not experienced as temporary; it becomes a defining condition of everyday life.

Trust, Fatigue, and Willingness to Engage

A recurring theme across informal feedback is consultation fatigue arising from:

- repeated engagement without corresponding secured outcomes
- perceived dilution or deferral of earlier commitments

- uncertainty about how feedback influences decisions

For some residents, this has translated into reduced participation or guarded engagement rather than a lack of concern.

Reduced or quieter participation during the exhibition should therefore not be read as satisfaction. In this context, it is more accurately understood as a product of fatigue, limited trust, and unequal capacity to keep engaging.

In addition, engagement processes primarily focus on current tenants and nearby residents, with limited consideration of future tenants, including those on social housing waiting lists. These future residents will form part of the community generated by the redevelopment, yet they have no meaningful mechanism to shape outcomes that will directly affect them. This gap creates a structural imbalance in representation and risks embedding unmet future demand into the precinct's design and delivery.

Additional Themes Raised by Some Community Members

Community feedback received during and after the exhibition period also reflects a range of additional concerns and arguments raised by some residents and advocates. These views are noted here for completeness and balance; they are not presented as positions of this submission.

- **Public housing tenure, not just housing numbers**

Some residents distinguish between retaining the number of social housing dwellings and retaining public housing tenure specifically. Concerns are expressed that replacement through community housing alone may alter tenants' rights, rent calculations, succession arrangements, and long-term security, even where dwellings remain physically on the estate.

- **Perceived inequity in staging and sequencing**

A recurring concern is that staging arrangements may prioritise the delivery of private or market housing over the replacement of social housing and community infrastructure, leaving existing tenants to experience longer periods of disruption and uncertainty before benefits are realised.

- **Loss of informal and low-threshold community spaces**

Some residents argue that while open space provision may increase quantitatively, informal and flexible gathering spaces — places to sit, meet, and socialise without formal programming or management — risk being lost or replaced by more regulated or surveilled environments that feel less accessible or welcoming.

- **Design-led behaviour management**

Some community members raise concerns that safety, CPTED, and activation measures may function less as protection and more as forms of behaviour control or displacement, shaping who feels welcome in public space and how space can be used in everyday life.
- **Health impacts of displacement and prolonged disruption**

Residents with chronic illness, disability, or complex health needs highlight the risk that relocation — even temporary — can disrupt established relationships with GPs, allied health providers, pharmacies, and home-based supports, with impacts that are not always captured by standard social impact assessments.
- **Construction impacts framed as cumulative health harm**

Some residents describe noise, dust, vibration, sleep disruption, and ongoing uncertainty as cumulative health impacts rather than temporary amenity issues, particularly for older tenants and those already experiencing illness or disability.
- **Experience-based scepticism from other estate renewals**

Some distrust expressed during engagement is grounded in observation of outcomes at other public housing redevelopment sites, where social infrastructure, service presence, or governance commitments were perceived to diminish after approval, despite earlier assurances.
- **Cultural loss and erosion of place identity**

Some residents describe Waterloo as more than a housing site — it is a place with shared history, informal care networks, and cultural identity. Concerns have been raised that large-scale redevelopment risks eroding these social and cultural dimensions, even where physical housing outcomes improve. For example, long-term residents frequently note that they no longer recognise nearby Redfern Street due to rapid gentrification, contributing to a broader sense of exclusion and loss of belonging within their own neighbourhood.
- **Ongoing digital exclusion**

Beyond consultation, some residents express concern that increasingly digital systems for communication, maintenance, booking, and governance will persist post-redevelopment, reinforcing barriers for older tenants and those with limited digital access or literacy.

Waterloo survey insights

Survey evidence from Waterloo tenants reinforces the concerns identified through service delivery and informal engagement. Baseline results indicate low levels of perceived voice and influence, with only a minority of tenants believing their views are heard. At the same time, the survey points to high levels of vulnerability, including poor health, loneliness, safety concerns, and difficulty accessing services. These findings are consistent with lived experience on the ground and support the need for structural, not purely engagement-based, mitigation measures. The proposal does not clearly demonstrate how renewal will address these issues through design or enforceable mitigation.

Recommended Conditions

The conditions below distinguish between matters that must be structurally secured now and matters that may appropriately be refined later without undermining the social integrity of the proposal. They do not require the proposal to be redesigned from first principles. They do require reasonable certainty about location, sequencing, governance, and operational capacity.

Where a direct consent condition does not appropriately secure a matter, the consent authority should require an equivalent binding mechanism through future detailed applications, management frameworks, planning agreements, or other approval instruments.

Counterpoint recommends that the consent authority treat the following as priority conditions, followed by supporting conditions needed to ensure those primary safeguards function in practice.

Primary Conditions — Social Infrastructure and Early Delivery

- a dedicated community centre secured as a required component of the redevelopment, not merely generic *facility* language or a possible future community-compatible use
- location within, adjoining, or directly fronting the central civic park so that the park functions as an active social heart rather than only open space on plan
- delivery timing tied to early stages of redevelopment, with clear triggers ensuring that the community centre is operational before or concurrent with significant population uplift and peak disruption periods, rather than deferred to later stages of delivery
- long-term affordable tenure and operating certainty for recognised not-for-profit community providers with demonstrated local trust and capability
- fit-out, staffing, and operating capacity sufficient to respond to increased demand during relocation, disruption, and population growth

- social impact mitigation must include secured funding and resourcing for independent community development workers, tenant support roles, and advocacy capacity, recognising that infrastructure alone is insufficient without a trusted, staffed presence to support residents through prolonged disruption and system complexity
- Where affordable housing forms part of the redevelopment, it should be secured as affordable housing in perpetuity and managed by a registered community housing provider so that affordability is not lost over time

Primary Conditions — Governance and Accountability

- governance, strata, and management arrangements that ensure coherent oversight across tenures, protect access to shared and community-serving spaces, and avoid fragmented accountability or a two-tier outcome in resident experience
- a standing, independently chaired precinct governance forum continuing across all stages of delivery
- published actions, responsibilities, and timeframes so that issues raised through delivery are visible and trackable
- a clear escalation pathway for unresolved matters affecting residents, services, safety, access, and social infrastructure
- governance arrangements independent of purely commercial placemaking or project-promotion functions

Primary Conditions — Built Form, Amenity, and Social Protection During Works

- built-form parameters and setbacks that protect adequate solar access and usability for the central park and other key public spaces, particularly in winter
- design safeguards that support passive surveillance, safety, acoustic amenity, and socially legible movement routes for older residents and people with limited mobility
- a minimum social-protection-during-works package, including continuous accessible paths of travel, clear wayfinding, temporary seating and shelter on key routes, predictable arrangements for carers and service access, and responsive on-site support during high-impact periods
- amenity equity across tenures so that social housing residents are not left with materially poorer access, interfaces, communal amenity, or public-domain outcomes than private residents

Supporting Conditions — Cumulative Impact, Estate-Wide Planning, and Review Triggers

- delivery triggers tying social infrastructure and operating capacity to population thresholds and peak disruption periods, not only completion
- estate-wide review mechanisms so that Waterloo South is not assessed in isolation from the cumulative demands of Waterloo Central and North
- staging principles requiring usable open space, legible pedestrian movement, and essential community supports to be available when disruption is greatest
- review points enabling the consent authority or relevant agencies to test whether social mitigation remains adequate as staging, population, and operational conditions change over time
- parking strategies that respond to existing resident, visitor, carer, and service-access needs and include EV-ready infrastructure so future charging access is not limited to higher-income or private-market residents
- road-network and access arrangements that do not unintentionally convert internal estate streets into through-traffic links to major arterial roads without transparent assessment of safety, traffic, and residential amenity impacts

Conclusion and Recommendation

The Waterloo Estate (South) Concept Proposal is stronger than earlier iterations and reflects genuine improvement. However, improvement is not the same as adequacy. The proposal still leaves too many socially critical matters dependent on later design development, management plans, funding choices, or future engagement processes.

For that reason, Counterpoint does not recommend refusal on the basis that renewal should not proceed. It recommends that consent, if granted, be conditioned to secure the essential social infrastructure, built-form safeguards, staging protections, and governance arrangements identified in this submission. Those matters are not peripheral to the project's success; they are the conditions under which renewal becomes socially workable, and planning outcomes remain credible over time.

The Concept SSD stage is the point at which the consent authority still has the leverage to secure those outcomes. If they are not fixed now, many of them will become harder to deliver, easier to defer, and more likely to be displaced by competing pressures over a 10–15-year staging period.

Counterpoint, therefore, urges the consent authority to approve the proposal only on the condition that these core safeguards are secured and that it is made clear that social mitigation is a binding requirement of renewal, not an aspiration to be revisited later.

References / Supporting Material (as cited or relied upon)

- Waterloo Estate (South) Concept State Significant Development Application (SSDA) — Environmental Impact Statement (EIS) and all exhibited supporting documents
- Appendix C — Mitigation and Management Measures
- Appendix D — Community Consultation Table / Consultation Summary
- Appendix E — Design Guide Assessment against the Waterloo Estate (South) Design Guide
- Appendix EE — Social Impact Assessment (SIA)
- Appendix J — Public Domain and Landscape Report
- Appendix K — Crime Prevention Through Environmental Design (CPTED) Assessment
- Design Excellence Strategy (submitted with the Concept SSDA)
- Counterpoint Community Services — prior written submissions and correspondence lodged across Waterloo Renewal consultation and assessment stages (as referenced in this submission)
- Waterloo Human Services Residents Survey