



Submissions Report

*Waterloo Metro Quarter -
Central Precinct (SSD-
79307746)*

March 2026

Prepared for: WL Developer Pty Ltd

Urbis staff responsible for this report were:

Director Peter Strudwick
Associate Director Michael Beale
Project Code P0056227
Report Number Final

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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1 Introduction

This Submissions Report has been prepared by Urbis Ltd (**Urbis**) on behalf of WL Developer Pty Ltd in relation to the proposed Over Station Development within the central precinct of the Waterloo Metro Quarter (**WMQ**) site. State Significant Development Application (**SSDA**) reference SSD-79307746 was lodged to the Department of Planning, Housing and Infrastructure (**DPHI**) in November 2025 and seeks consent for the detailed design, construction and operation of a mixed-use development comprising a co-living tower atop a podium comprising retail, childcare and community uses.

This Submissions Report has been prepared to address the matters raised by public agencies, City of Sydney Council, the community and other relevant stakeholders throughout the public exhibition period (27th November 2025 – 15th January 2026). It has been prepared in accordance with the DPHI's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1 Exhibited Project

The SSDA seeks consent for the design, construction and operation of a 26 storey (including plant level) mixed use building within the central precinct (the site) of the WMQ site. The proposal comprises a co-living housing tower above a three storey podium containing retail and a community facility in the form of a childcare centre. Specifically, the proposed development comprises:

- Ground level retail tenancies, community facility, and childcare, co-living and shared basement access lobbies
- Community centre in the form of a childcare centre at Level 1 and Level 2
- A Co-living housing tower from Levels 3 to 24 comprising:
 - Self-contained co-living accommodation rooms across 20 levels, with capacity of 500 units
 - Indoor and outdoor communal amenity at Levels 3 and 24
 - Communal space also provided on each accommodation level
- Ground level vehicular access from Church Square shared zone to the shared basement
- Creation of a pedestrian thoroughfare that connects with Cope Street Plaza, creation of Grit Square fronting Botany Road, landscaping and public domain works.
- Indicative building signage zones

1.2 Response to Submissions

Responses to each of the comments raised have been addressed in this report and are supported by the additional information outlined below.

1.3 Supporting Documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Submissions Register	Urbis
Appendix B	Supplementary Design Report	Bates Smart
Appendix C	Civil Engineering Memo	Robert Bird Group

Appendix	Report	Prepared By
Appendix D	Traffic Engineering Memo	ptc
Appendix E	Wind Engineering Memo	RWDI
Appendix F	Flood Addendum	WSP
Appendix G	Fire Engineering Letter	Stantec
Appendix H	Updated Clause 4.6	Urbis
Appendix I	Revised Statutory Compliance Table	Urbis
Appendix J	Mitigation Measures Table (unchanged)	Urbis
Appendix K	Updated Landscape Plan (Level 03 terrace)	Aspect Studios
Appendix L	Connecting with Country Guidelines	Murawin

2 Analysis of Submissions

The SSDA was publicly exhibited from 27 November 2025 to 15 January 2026 (50 days). A breakdown of submissions is set out below.

2.1 Agency submissions

A total of four submissions were received from government agencies during the public exhibition. Submissions were received from:

- Transport for New South Wales;
- Sydney Metro;
- Civil Aviation Safety Authority;
- Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation Group

Additionally, City of Sydney Council and Air Services Australia confirmed that they had no comments on the proposed development.

Key issues raised in the agency submissions can be broadly grouped into the following categories:

- Issues relating specifically to the Central Precinct
 - Flood risk and emergency management
- Matters relating to the overall WMQ development:
 - Drainage
 - Loading and deliveries
 - Green travel Plan
 - Flood Risk

Additionally, comments were received from DPHI and have been addressed in this report and the accompanying documentation. A response to all submissions received is included in the 'Response to Submissions' section below.

2.2 Special Interest Groups and Public Submissions

There were two submissions from Special Interest Groups and three submissions from members of the public. The submissions included three objections and one letter of support. One submission was neutral.

The submissions relevant to the Central Precinct development related to a range of matters including:

- The proposed co-living accommodation and its future management
- Community floorspace
- Management of the childcare centre
- Social impact assessment
- Overshadowing
- Public engagement
- Parking management
- Connecting with Country
- Construction mitigation measures

3 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1 Further Engagement

The Applicant met with DPFI on two occasions (18th February and 2nd March 2026) throughout the RTS report preparation to discuss the key issues raised in the agency and public submissions and the proposed approach to responding.

3.2 Refinements to the project

In response to the key issues raised within the submissions, a minor design refinement has been made to part of the terrace located at Level 3. The terrace area in the south-east of the floor plan will now be used as an activities / game area as shown on the accompanying landscaping plan enclosed in Appendix K.

4 Responses to Submissions

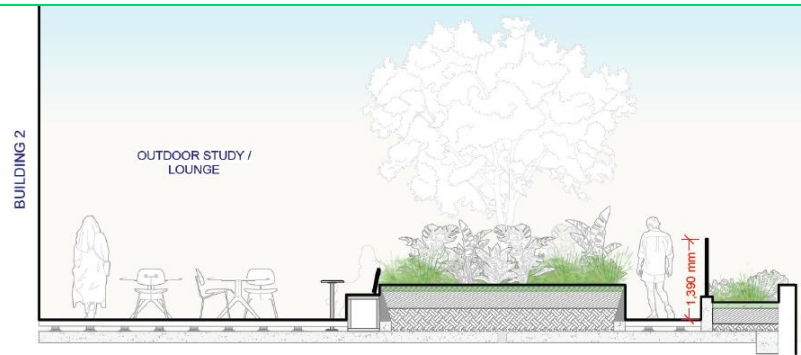
All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-79316759).

This section provides a detailed summary of the Applicant's response to the issues raised in submissions as well as those upon which DPHI have requested further information or clarification.

4.1 Response to DPHI, Agencies and Council

Table 2 Response to issues raised by DPHI, agencies and Council

Issue Raised	Response	Appendix
Department of Planning, Housing and Infrastructure		
<i>Statutory Compliance</i>		
<p>Provide further details, including supporting documentation and drawings to illustrate how the proposal achieves consistency with the maximum gross floor area (GFA) permitted under the Concept Approval. This must include how the proposed exclusions (such as the Level 1 and 2 Childcare outdoor play areas, and the Level 3 communal areas) in the Central Precinct meet the definition of GFA under the Sydney Local Environmental Plan 2012 (Sydney LEP).</p>	<p>The accompanying Supplementary Design Report prepared by Bates Smart identifies the areas excluded from the Building 2 GFA. These areas are located on the external terraces of the childcare centre at level 1 and level 2 and relate to planters that are immediately adjacent to 'openings' within the external wall. The openings are covered by porous mesh screens resulting in the adjacent areas being open to the elements.</p> <p>The planters have a height of less than 1.4m. Accordingly, these areas have been excluded from the calculation of GFA.</p> <p>The outdoor Level 3 communal area does not comprise GFA and has been excluded from the GFA calculation under subclause (i) of the GFA definition in the Sydney LEP.</p>	<p>Appendix B – Supplementary Design Report</p>



Level 3 Roof Terrace Section

Overall, the total GFA across the Southern, Central and Northern Precincts is 68,747sqm. The total GFA is below the approved GFA under the Concept SSD, which is 68,750m² excluding station floor space. The FSR for the overall WMQ development remain below 6:1. Accordingly, the second amending concept proposal remain compliant with the approved GFA for the OSD.

Provide a revised Clause 4.6 Statement addressing the objective of Sydney LEP section 6.45(1)(a) in respect to the variation of the minimum non-residential floorspace standard.

A revised Clause 4.6 Variation Request has been prepared and is enclosed with this Submissions Report. The revised Clause 4.6 Variation Request addresses the objectives of the Sydney LEP clause 6.45(1)(a).

Appendix I – Revised Statutory Compliance Table

Review and correct any inconsistencies regarding each SSD’s performance against the Sydney LEP within the Statutory Compliance Table provided at Appendix Z.

The Statutory Compliance Table has been reviewed and any inconsistencies removed.

Appendix K – Updated Landscape Plan (Level 03)

Residential amenity

Provide information on the sizes of the proposed co-living units and demonstrate that the proposed units will achieve acceptable residential amenity with reference to the

Section 1.9 of the Sydney LEP 2012 states that Chapter 3 Part 3 of State Environmental Planning Policy (Housing) 2021 does not apply to land in the Waterloo Metro Quarter. Chapter 3 Part 3 of the Housing SEPP relates to co-living housing and includes non-discretionary

Appendix B – Supplementary Design Report

standards contained in Part 3 of Chapter 3 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

development standards (Section 68) and 'standards for co-living housing'.

Notwithstanding, an assessment against the non-discretionary standards and standards for co-living housing has been included in Appendix B for completeness. The assessment shows that the proposed development is generally consistent with the non-discretionary standards and standards for co-living housing. Where variations are proposed, these do not impact the quality or amenity of the co-living housing and are consistent with the scheme endorsed by the SDRP.

The proposed co-living accommodation room sizes have also been guided by the standards set out within Chapter 3 of the Housing SEPP. The majority of the co-living rooms have an area of between 12 square metres to 25 square metres (excluding areas for the purpose of bathrooms or kitchens). A limited number of rooms (approximately 3% of all units) exceed the Housing SEPP standards. The larger rooms exceed the Housing SEPP standards by approximately 3 square metres and support a diversity of housing options and adaptable / flexible living arrangements. The provision of these larger units is consistent with advice received through the State Design Review Panel process.

Public Benefit - Community Facilities

Submit further information to demonstrate that the proposed community facilities meet the requirements of Conditions A12 and A12(a) of SSD 9393. More specifically, please confirm:

- a) Details of the public authority or non-profit community organisation entity who will own or control the proposed community facility

The public authority or non-profit community organisation that will own or control the proposed community facility is yet to be confirmed.

N/A

A restrictive covenant will be put in place to ensure that the use of the facility will be restricted to a community facility owned or controlled by a public authority or non-profit community organisation. The requirement for this restrictive covenant to be registered can be secured by way of a planning condition.

- b) The mechanism (such as a restriction on land title or similar) that would be put in place to restrict the use of the property for a community facility
- c) How the community facility would be retained in perpetuity, consistent with the Concept Approval and Sydney LEP 2012

The proposed approach is fully consistent with that approved under the previous Central Precinct SSDA (reference SSD 10439).

Design Integrity Reports

- a) Provide further response to the State Design Review Panel's (SDRP) advice, in particular:

- Review the design of the ground floor / retail layouts of the Northern and Central Precinct to achieve equitable access to shared amenities / back of house areas; and

Address SDRP advice on Site Strategy and Built Form Point 8: Ensure that the serviceability of the retail offerings is considered during design development. For example, access to shared amenities, ventilation requirements and kitchen exhausts

- Review the design of the loading dock within the Northern Precinct addressing TfNSW submission regarding sight lines and pedestrian safety; and

Address SDRP's advice on Site Strategy and Built Form Point 9: *Ensure that vehicles leaving the loading bay have sufficient line of sight to exit the*

Ground level shared amenities for the Central Precinct are centrally located to ensure convenient and equitable access for all retail tenancies. The location is separated from vehicular paths to promote pedestrian safety and the entrance benefits from clear visibility from the public domain.

All waste collections will occur onsite from the shared loading dock at ground level. Retail waste will be transferred at ground level between tenancies with a shared retail waste room located near the loading dock. An allowance has been made for three (3) 3000L/s exhaust risers serving the ground floor retail tenancies, providing capacity for future food and beverage uses.

The Connecting with Country Guidelines are appended to the Supplementary Design Report prepared by Bates Smart. Building 2 incorporates public art woven into the metal mesh inserts located on parts of the elevation at Level 1 and Level 2 around the childcare centre. The artwork will be a two-dimensional design that reflects the designated theme of Celebrating Country and which responds to Guiding Principle 3 'Celebrate local culture with pride' of the Murawin Connecting with Country Guidelines. The full extent of the artwork is pending further development with the selected artist. There is an opportunity for community co-design through the design development process.

Appendix B – Supplementary Design Report

building safely, noting the high number of pedestrians using this footpath.

- Provide a copy of the site-specific Connecting with Country Guidelines, as prepared by Murawin, including an assessment of the proposal's design response to each of the guiding principles; and
Address SDRP's advice on Connecting with Country Point 1: Further exploration of community engagement and empowerment opportunities within the design and operation of the development is encouraged. A document outlining how indigenous business empowerment and co-design will guide the project's design and operation should be developed.

Centrally located at the heart of the Waterloo Metro Quarter, the childcare facility engages the public domain and maintains direct visual connections to the Cope Street Plaza, where public art is integrated within the plaza.

The Supplementary Design Report prepared by Bates Smart also explains how the proposed development responds to the other Guiding Principles of the Murawin Connecting with Country Framework.

Wind impacts

- a) Provide design solutions and/or mitigation measures that achieve wind comfort outcomes suitable for the intended uses without solely relying on awnings or planting, and consider the following areas:
 - A. A sitting criteria for the proposed licensed seating areas on the western ground floor elevation of the Central Precinct (Sensor locations 51 and 53), including incorporation of wind screens and balustrades as stated in section 3.5.1 of the Wind Impact Assessment

In response to the item 6a (a-c), reference is made to the Waterloo Metro Quarter Design and Amenity Guidelines which provides "Objectives" and "Design Criteria" to be met by the Proposed Development as well as "Design Guidance" to assist in achieving these targets. This guidance reads:

1. Wind impacts should be managed through built form massing, where possible, rather than relying solely on mitigation measures such as awnings and planting.

Consistent with this, the project underwent an extensive wind-informed design process involving RWDI, Woods Bagot, Bates Smart, and Aspect Studios where the early design massing was explored and developed to provide the best possible outcome for wind performance and other design constraints such as solar

Appendix E – Wind Engineering Memo

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- B. A standing criteria for Grit Lane between Botany Road and the southern station entrance (Sensor locations 25, 50 and 52)
 - C. A standing criteria for the corner of Botany Road and Raglan Street (Sensor locations 59, 60 and 62)
 - D. A sitting criteria for podium and rooftop spaces where outdoor seating / dining and kitchen / study areas are proposed (Sensor locations 124, 125, 128, 129, 130 and 131)

access/reflectivity and natural ventilation. This design was further developed as part of the current SSDA in consultation with the NSW State Design Review Panel (SDRP) through an in-depth process including SDRP design meetings where design features such as awnings and intent were discussed.

The final built form tested was the result of the above iterative design collaboration and provided a positive outcome for the precinct. The design was observed to achieve the required criteria from the Design and Amenity Guidelines with only the built form massing for majority of the areas.

For areas where residual exceedances were identified, targeted wind mitigation measures were recommended to supplement the built form strategies and included screening within Church Square and Grit Lane as well as planting throughout the site. The current design of the Proposed Development with the inclusion of these proposed measures is expected to satisfy the criteria requirements of the Design and Amenity Guidelines for most of the zones within the proposed site. The image and table included within the accompanying Wind Impact memorandum show the percent of time suitable for the required criteria at the sensor locations relevant to RFI Item 6a (a-c) for the Built Form only and also with included landscaping.

Note the achievement of these required wind conditions are not solely reliant on these additional measures but primarily as a result of the built form massing design including tower setbacks, generous laneways, corner articulation, increased tower separation and other design features borne from the in-depth design process. An example of these features are the awnings that exist throughout the design, which fulfill other amenity requirements in addition to addressing wind impacts. In principle mitigation measures were provided for the outstanding areas within Grit Lane to bring the

conditions to within standing as required by Design and Amenity Guidelines. These included screening and balustrades within the area as shown in Image 9 of the report, Appendix I - Wind Impact Assessment as submitted as part of SSD-79307746 and SSD-79307758.

b) Demonstrate the proposal would meet the requirements of Condition B14 of the Concept Approval requiring wind comfort, standing criteria to waiting zones at crossings of intersections (e.g. Sensor locations 4, 38 and 61 in the Wind Impact Assessment), including on the opposite sides of the streets.

Elevated terrace and rooftops are not governed by the public-domain criteria zones of the Design and Amenity Guidelines. Nonetheless, RWDI assessed these areas using appropriate comfort targets based on intended uses. These targets are achieved through the inclusion of awnings, balustrades, and landscape elements that form part of the inherent amenity and design intent of these terraces, rather than being added solely for wind mitigation purposes.

The diagrams and table included in the wind memo summarise the application of use-specific Design Comfort Targets to each sensor location across the Level 03 terrace and Level 24 rooftop. The selected targets – Walking, Standing, or Sitting, reflect the intended function of each space, including movement zones, low-impact sport areas, BBQ/gathering areas, and outdoor seating/study spaces.

The results show that once the as-designed landscape, awnings, and balustrades are included, all locations achieve or exceed the 95% suitability target for their intended use. Areas not designed for seating (e.g., tree zones or low-impact sport areas) were appropriately assessed using Walking or Standing criteria, and these also meet target conditions.

Overall, the information confirms that the wind environment on both terrace levels has been carefully considered and is suitable for the proposed uses, with comfort performance achieved through the inherent design and amenity strategy of the project.

**Appendix E -
Wind Engineering
Memo**

Flood impacts

Submit a revised Flood Impact Assessment (flood analysis, mitigating measures and evacuation /emergency strategy) addressing concerns raised in the submissions made by the Conservation Programs, Heritage and Regulation Group (Department of Climate Change, Energy, the Environment and Water), including:

- A) Review the flood planning levels with climate change sensitivity analysis for the Northern Precinct either by applying freeboard to the retail floor levels, or alternatively using the latest methodologies in the Australian Rainfall and Runoff Guidebook to develop more accurate estimates of changes to flood levels under climate change conditions
- B) Relocate the habitable use (building management office) from the basement
- C) Demonstrate how occupants of the Central Precinct south-western retail area could feasibly relocate to higher levels considering available warning time and mechanisms to provide warnings
- D) Submit revised emergency management and evacuation strategy detailing approach for occupants that need to relocate to on-site shelter, including the basement and details on the emergency management for the childcare centre
- E) Any emergency management and evacuation strategy should be prepared in accordance with the

A detailed response relating to the items raised in comments A and B are provided in the respective Submissions Reports prepared for the related Northern Precinct SSDA and basement modification application.

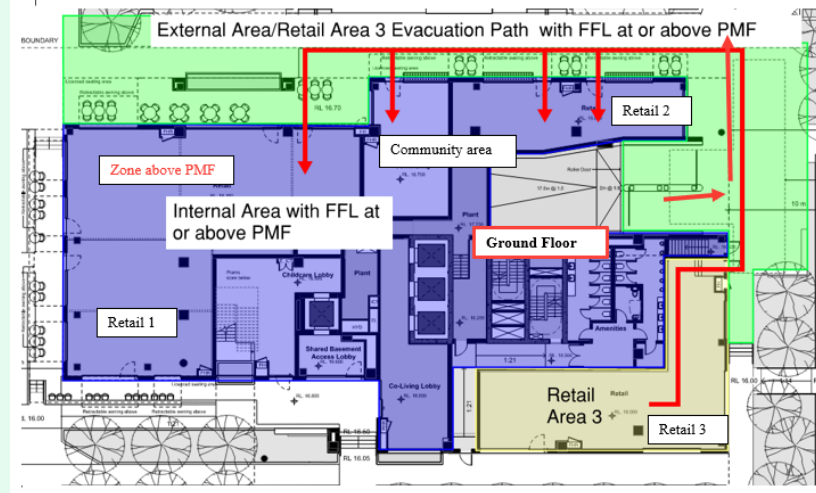
A Flood Addendum has been prepared by WSP to address comments C - E and is enclosed in Appendix F.

Retail Area 3

The Flood Addendum notes that the proposed development incorporates a podium that raises the ground level along Botany Road and Church Square adjacent to the Congregational Church. The raised Finished Floor Level (FFL) of RL 16.00m AHD provides Retail Area 3 with protection from a 1% AEP flood. To address flood resilience requirements for the Probable Maximum Flood (PMF) level, Retail Area 3 has been provided with a dedicated evacuation exit providing direct egress to Church Lane, which is situated above the PMF level. This evacuation route has an FFL of RL 16.500m AHD, ensuring that occupants can safely relocate to higher ground during extreme flood events.

Appendix F – Flood Addendum

Shelter-in-Place Guidelines for Flash Flooding and in consultation with NSW SES.



Additionally, the internal layout of the proposed development has been designed with regard to the Shelter-in-place guidelines (CPHR, 2023).

Detailed procedures for occupant evacuation, including warning mechanisms, communication protocols, and expected warning timeframes, will be set out in the Flood Emergency Response Plan for the site. A draft Flood and Emergency Response Plan is included within the Flood Addendum. The draft Flood and Emergency Response Plan has been informed by the Shelter-in-place guidelines (CPHR, 2023) and engagement with NSW SES has commenced in relation to this document. WSP will continue to refine the Flood Emergency Response Plan in consultation with NSW SES following the determination of the Central Precinct SSDA.

Childcare Centre

The Flood Addendum notes that the childcare centre lobby is located at ground floor level and will become surrounded by floodwaters during a PMF event. However, the lobby entrance floor

level is designed to be RL 16.600M AHD, which is above the PMF flood level.

The Flood Addendum anticipates that under the PMF scenario, the maximum water depth in front of the childcare lobby will be approximately 110mm below the proposed finished floor level of the lobby. Accordingly, occupants within the Childcare Centre lobby will be protected for flood events up to and including the PMF. In extreme flood events, occupants will be able to utilise the internal stairs to take refuge on Level 1.

The Flood Emergency Response Plan for the Central Precinct will provide detailed procedures for childcare and basement occupant evacuation to relocate to on-site shelter, including warning mechanisms, communication protocols and expected warning timeframes.

Refuge in Level 1 will allow occupants to wait until surrounding floodwaters have receded. Refuge at Level 1 will comply with the requirements of shelter-in-place guidelines for the shelter to be weather protected, structurally stable in the PMG, and have a sufficient floor area for all people likely to be on site at any one time.

Amendments to and consistencies with the Concept Approval

a) Submit a draft notice of modification identifying the proposed changes to the Concept Approval

A draft notice of modification has been prepared in relation to the related Second Amending Concept SSDA. Please refer to the Submissions Report prepared for the Second Amending Concept SSDA.

N/A

b) Identify changes required to the Waterloo Metro Quarter Design and Amenity Guidelines consequential to the Second Amending Concept

Please refer to the Submissions Report prepared for the Second Amending Concept SSDA in relation to this comment.

N/A

<p>c) Demonstrate evidence of consultation with Fire and Rescue NSW and provide a fire engineering analysis to demonstrate compliance with Condition A20 of the Concept Approval (SSD 9393). The associated BCA and DDA Reports should be reviewed as part of the prepared fire engineering analysis</p>	<p>A fire engineering statement for the proposed Central Precinct development has been prepared by Stantec. The statement is enclosed in Appendix G and confirms that compliance with the relevant provisions of the Building Code of Australia will be achieved by satisfying the relevant Performance Requirements based on a combination of a Performance Solution and a Deemed-to-Satisfy Solution.</p> <p>A Fire Engineering Brief Questionnaire will subsequently be prepared following determination of the SSDA for stakeholder review (including Fire and Rescue NSW).</p> <p>The Applicant's fire engineering consultant (Stantec) was informed (via email correspondence dated 3rd March 2026) by FRNSW that they should be consulted at a later date (as part of the Fire Engineering Brief Questionnaire process).</p>	<p>Appendix G – Fire Engineering Letter</p>
<p>d) Provide details of consultation undertaken with the Waterloo Congregation Church, including issues raised and project response.</p>	<p>Consultation was previously undertaken with the Waterloo Congregation Church prior to lodgement of the SSDA. This included a meeting with the church on 7th August 2025 to discuss the proposed submissions. The church were also invited to attend a community webinar on 3rd September 2025.</p> <p>Following lodgement, the Applicant met with the Church on 12th December to provide an update on the applications. On-going meetings and communications have taken place with the church to discuss the status of the SSDAs, on-going operation matters and a future separate local DA (intended to improve public domain areas within the Church site) for works by Mirvac on behalf of the Church.</p> <p>Comments raised by the Church during the ongoing engagement has focussed on the construction impacts of the proposed development, which will be mitigated through the measures identified within the EIS.</p>	<p>N/A</p>

City of Sydney Council

Thank you for referring the following application for the City's consideration: Noted.

N/A

- Waterloo Metro Quarter – Second Amending Concept (SSD-79307765)
- Waterloo Metro Quarter – Northern Precinct (SSD-79307758)
- Waterloo Metro Quarter – Central Precinct (SSD-79307746)
- Waterloo Basement – Modification 3 for internal layout changes (SSD-10438-Mod-3)

The City does not wish to make an objection to the any of the above applications at this time. Please continue to refer further applications to the City for consideration.

Transport for New South Wales (TfNSW)

Drainage

TfNSW notes that the submitted information includes an Integrated Water Management Plan (Appendix V). However, TfNSW has been unable to identify sufficient detail to assess the potential impacts of stormwater discharge on its drainage infrastructure within Botany Road.

Accordingly, TfNSW requests that stormwater plans for any proposed drainage connections/changes on Botany Road and hydraulic calculations be provided for pre and post development stormwater discharge rates to Botany Road,

The Applicant's civil consultant (Robert Bird Group) has prepared detailed engineering drawings and hydraulic calculations to demonstrate the pre-development and post-development stormwater discharge to Botany Road. The discharge rates are expressed in litres per second for the 1-in-5 year, 1-in-10-year, 1-in-20-year, and 1-in-100 year rainfall events.

The drawings and hydraulic engineering calculations have been submitted to TfNSW under separate cover. Please refer to the supporting technical memo prepared by Robert Bird Group (Appendix C) for further information.

**Appendix C –
Civil engineering
memo**

in litres/second, for the 1 in 5 year, 1 in 10 year, 1 in 20 year, and 1 in 100 year rainfall events.

Loading and deliveries

TfNSW notes that the loading dock provided in the Northern Precinct will also service the Central Precinct (Building 2), with vehicular access via Botany Road. TfNSW has concerns regarding service vehicle access to the site from Botany Road. Botany Road functions as a major arterial road and a key public transport corridor, accommodating multiple bus routes that connect south-eastern Sydney with heavy rail and Metro stations, including Mascot, Green Square, Redfern, and Waterloo Metro. The currently proposed access arrangements to Botany Road have the potential to create safety, efficiency and ongoing operational impacts on the adjoining classified road for pedestrians, public transport and general road users.

The proposed location and configuration of the loading dock access from Botany Road is consistent with the previously approved development for the site, which established Botany Road as the primary access point for service vehicles.

In addition to the loading dock on Botany Road, the development provides five (5) dedicated service/courier bays within the basement (P1 level), accessed via Cope Street. These bays assist to reduce the reliance on the ground floor loading dock and enables a significant portion of smaller service vehicles to avoid the Botany Road entrance entirely.

The Freight Forecaster inputs incorporate demand generated by both precincts, ensuring the proposed bay provision aligns with the combined requirements of the development. The Freight Forecaster identifies a requirement for 5 small bays; 2 medium bays and 1 large bay, which are all provided for in the proposed development.

Refer to Traffic and Parking Response prepared by ptc for further information.

In addition to the above, TfNSW raises the following concerns with the currently proposed loading dock access arrangement from Botany Road:

- a) The available distance between the driveway, garage door, and footpath is insufficient to accommodate the longest service vehicle required to access the site. As such, service vehicles will be queued within the Botany Road road reserve (i.e. within the pedestrian/footpath area). Any queuing of service vehicles would adversely

The largest service vehicle (medium rigid vehicle) required to access the site can be fully accommodated within the property boundary. The vehicle is able to enter the driveway and await access to the loading dock without encroaching on the Botany Road reserve.

In addition, a Loading Dock Management Plan (**LDMP**) will be implemented to manage operational protocols for the loading dock. The LDMP will include staggered and scheduled use of the loading dock to avoid entry and exit conflicts as well as procedures to ensure

**Appendix D –
Traffic
engineering
memo**

impact pedestrian movements along Botany Road and compromise the safety and efficiency of vehicular movements on Botany Road, noting the significant pedestrian movements that will result from current and planned public transport infrastructure upgrades and from this development.

effective coordination between service providers and the loading dock manager.

Furthermore, all non-residential waste collection will be undertaken by private contractors. These services will be scheduled during off-peak periods to avoid overlap with City of Sydney waste collection operations or other service vehicles accessing the site. This coordinated approach will improve the safety and efficiency of loading dock operations while minimising impacts to Botany Road and pedestrian movements.

b) Pedestrian sight distances at the Botany Road access are constrained by the building being located on the property boundary. Given the site's location above Waterloo Metro Station and the expected high pedestrian volumes, vehicle access arrangements must provide adequate sight lines to pedestrians and cyclists.

The building is set back from the property boundary at the Botany Road access point, ensuring that the required pedestrian sight lines are achieved. As a result, there is no visibility obstructions to the public footpath, and the arrangement complies with the sight distance requirements prescribed in AS2890.2 – Figure 3.4.

In addition to meeting the relevant standard, several operational and physical measures will further enhance visibility and pedestrian safety. Standard exit signage will be installed instructing drivers to “STOP – GIVE WAY TO PEDESTRIANS,” reinforcing pedestrian priority at the interface with the footpath. A convex mirror can also be installed on the northern wall of the entryway to improve intervisibility between exiting vehicles and approaching pedestrians or cyclists.

**Appendix D –
Traffic
engineering
memo**

c) A preliminary review of the swept path analysis for the loading dock area (Appendix 3 in Appendix R) indicates that service vehicles are unable to enter and exit the site simultaneously while maintaining the required clearances. In addition, the swept path diagrams demonstrate that vehicles would encroach into the adjoining traffic lane on Botany Road to complete the necessary manoeuvres. This arrangement is not acceptable given the scale and demands of the

A comprehensive Loading Dock Management Plan (LDMP) will govern the operation of the loading dock to ensure safe and efficient vehicle movements. The LDMP will be supported by a loading dock management system and an on site dock manager responsible for coordinating all service vehicle arrivals and departures. This system will stagger service vehicle access and ensure that only one vehicle uses the layback/driveway at any given time. Through these operational controls, potential conflicts on entry and exit will be

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subject development, as it would adversely impact the safety and operational efficiency of both pedestrians and vehicles on Botany Road, including public transport. Please note that TfNSW has not undertaken a detailed review of the swept paths provided for the loading dock area.

minimised and all service vehicle movements will be proactively managed.

While the swept path analysis indicates that vehicles cannot pass simultaneously within the layback/driveway, they are able to safely pass each other within the site boundary using the internal driveway and loading dock area. In the event that a vehicle arrives to enter while another is waiting for a suitable gap in traffic to depart, the entering vehicle may utilise both traffic lanes (as permitted within the NSW Road Rules) to create sufficient space for the departing vehicle to exit safely.

The analysis also shows that vehicles may marginally encroach into the adjoining traffic lane on Botany Road when entering the loading dock. This manoeuvre is permissible under the NSW Road Rules and is consistent with the arrangement accepted under the previously approved development.

d) TfNSW notes that a significant amount of retail and commercial floor space is proposed to be serviced by the shared loading dock. TfNSW has concerns that insufficient space has been provided to accommodate the ongoing servicing and loading demands of both the northern and central precincts (e.g. non-compliance with the suggested minimums). In addition, the proposal does not address the servicing requirements associated with occupants moving in and moving out of the 500-room co-living and 314 residential apartment components of the development. This will be primarily undertaken by vehicles that will need access to the shared loading dock, given their size.

The proposal retains the shared loading dock arrangement that was previously supported and approved, with a single loading dock servicing both the Northern and Central Precincts. The physical separation between these precincts remains unchanged from the earlier approval. To assist in managing this separation, service providers for the Central Precinct will be directed to utilise the service vehicle bays within the shared basement where operationally appropriate, thereby reducing reliance on the ground floor loading bays for short-stay servicing needs.

The number and type of service bays provided are in accordance with the recommendations of the TfNSW Freight Forecaster, as detailed in both the Traffic Impact Assessment (TIA) and the LDMP. These provisions ensure that the loading dock has sufficient

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e) Noting the comments above, insufficient information has been provided regarding the operational management of the loading dock. A more detailed Delivery and Servicing Plan is required to demonstrate how site generated servicing demands will be managed to ensure that vehicle queuing at the loading dock entry does not occur and that impacts on pedestrians and the adjoining road network are avoided. Further guidance on site delivery and servicing should be sought from [delivery-and-servicing-plan-guidance.pdf](#).

capacity to meet the projected service demands for the combined precincts.

A comprehensive LDMP, supported by a dock management system and an on-site loading dock manager, will coordinate all retail, commercial, co-living and residential servicing activities. This includes the management of courier bays, scheduling of move-ins and move-outs, and the active control of vehicle arrivals and departures to ensure operations remain within capacity constraints. The LDMP will also set out clear operational rules and incorporate staggered timing of service vehicle use to minimise conflicts and avoid queuing.

Move-in and move-out activity for both the Northern and Central Precincts will be inherently staged due to settlement timing, sale releases, and differing occupation commencement dates. A managed move-in schedule will be developed, and additional on-site support will be provided during the initial occupation phases to ensure efficient loading dock usage. Residents will also be encouraged to use smaller vehicles where possible, enabling them to utilise basement parking areas and thereby reduce demand on the ground floor loading dock.

For the Central Precinct co-living component, it is noted that all units are furnished. As such, residents are not expected to move large furniture items and will typically use smaller vehicles for personal belongings. These vehicles will be able to park within the basement and will not place additional pressure on loading dock operations.

Waste servicing for all non-residential components of the development will be undertaken by a private waste contractor. Collection times will be coordinated so that they do not coincide with City of Sydney waste collection periods. Further details are provided in the Waste Management Plan prepared by WSP.

Green Travel Plan

TfNSW notes that a Green Travel Plan (GTP – Appendix R) has been prepared as part of the submitted SSDA. TfNSW requests that the GTP be amended to address the following:

a) Mode Share Targets: It is recommended that the mode share for 'Car (as driver or passenger)'; as detailed in Section 9.3, should be reduced and public and active transport mode shares increased for residents, visitors, retail and commercial staff. These mode shifts need to be split into short-term, moderate, and long-term mode shares. GTP actions or initiatives to achieve these new splits of modal shares should be included in the Implementation Plan.

Noted. The Applicant will accept a condition to update and finalise the Green Travel Plan in consultation with TfNSW prior to issuing of the relevant Occupation Certificate.

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b) Bicycle parking and End of Trip Facilities (EoT): These need to be monitored over time to ensure sufficient supply to encourage active transport. Further, the bicycle parking should be flexible to allow for parking of other micromobility options, as they come on stream. The bicycle parking should be safe, secured and under cover.

Noted. The Applicant will accept a condition to update and finalise the Green Travel Plan in consultation with TfNSW prior to issuing of the relevant Occupation Certificate.

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c) Implementation Plan: Section 10: Proposed Action Items, should be changed to an Implementation Plan with committed actions ready for implementation from Day 1 of occupancy, including committed (not proposed) initiatives to encourage adoption of sustainable transport behaviour. The Implementation Plan should include timeframes for carrying out the actions and identify who is responsible, timing and dates, as well as funding for the initiatives. Sustainable transport options

Noted. The Applicant will accept a condition to update and finalise the Travel Access Guide in consultation with TfNSW prior to the issuing of the relevant Occupation Certificate.

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should be prioritised over parking initiatives. Please find these helpful reference materials from our NSW Government Travel Demand Management website - Examples of hard activities and Example of soft activities.

- d) Travel Access Guide (TAG): The TAG needs to cater to everyone who is using the proposed development site, including residents, visitors, and childcare and retail staff. The TAG should be regularly updated, as well as when new infrastructure and micromobility services come online. The aim of the TAG is to reduce single occupancy car use and encourage sustainable transport journeys to and from the site using public and active transport. The TAG should include:
- i) A comprehensive zoomed-out map showing all modes of public and active transport, including trains, buses, walking and cycling routes, as well as times for these public transport options, as well as clear guidance on the site location.
 - ii) A comprehensive zoomed-in map that provides information on the location of the internal facilities of the building, promoting bicycle parking and EoT facilities such as showers, lockers and change rooms for all users of the site.
 - iii) Breaking up text with photos.
 - iv) Provide information advising that service routes and timetables for trains and buses is available on the Trip Planner at transportnsw.info/.
 - v) Provide information about walking and cycling is available on the Trip Planner at transportnsw.info/.

A preliminary survey has been included as part of Section 6.2 of the Green Travel Plan that was submitted as part of the SSDA.

The Applicant will accept a condition to update and finalise the Travel Survey in consultation with TfNSW prior to the issuing of the relevant Occupation Certificate.

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<ul style="list-style-type: none"> vi) Provides clear messaging to residents, visitors and childcare and retail staff regarding active and public transport options, and any information on carpooling. vii) For further helpful information – please check this link – Travel plan toolkit NSW Government. 		
<p>e) Travel Survey: A Travel Survey be included as a separate appendix to survey for visitors and childcare and retail staff. The survey should have questions to obtain residential postcodes to help inform strategies that help reduce car use to and from the site. Active and public transport initiatives placed in the Implementation Plan should be used in questions to encourage more uptake of these. For further information, please visit – Online staff travel survey.</p>	<p>Noted. Refer to response above.</p>	<p>Appendix D – Traffic engineering memo</p>
<p>f) Governance of GTP: A Travel Coordinator needs to be appointed in the occupation phase and advised as an action in the above Implementation Plan. The Travel Coordinator will be responsible for the whole site with a supporting steering committee, to progress this plan. The development needs to have a strategy if the Travel Coordinator role is not extended for the life of the development so that the ongoing responsibilities for the GTP are still able to be undertaken effectively to achieve sustainable transport mode shares for the life of the development.</p>	<p>Noted. The Applicant will accept a condition to appoint a Travel Coordinator prior to occupation.</p>	<p>Appendix D – Traffic engineering memo</p>

Sydney Metro

Concurrence of Sydney Metro is not required

As this is an SSD development application, the provisions of section 2.99 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 do not apply.

Noted.

N/A

Section 4.13(2A) of the Environmental Planning and Assessment Act 1979 excludes concurrence or consultation requirements from applying to development applications for SSD, unless an environmental planning instrument requires concurrence or consultation to SSD. As section 2.99 of the T&ISEPP does not require concurrence to be provided in the context of a development application for SSD, concurrence is not required for the SSD.

Notwithstanding this, in order to ensure the appropriate management and mitigation of the proposed development's impacts on the Sydney Metro City & Southwest rail corridor, Sydney Metro has reviewed the SSD documents that were received by Sydney Metro on 26 November 2025, including having regard to the matters outlined in the T&ISEPP.

Conditions requested in the event of approval of the SSD

If the Department of Planning, Housing and Infrastructure determines to grant consent to the SSD, Sydney Metro requests that the following conditions be imposed on the development consent.

Noted. The Applicant accepts the proposed conditions.

N/A

Prior to issue of a Construction Certificate

1.1 The Applicant must provide Sydney Metro a summary of all Over Station Development (OSD) design loads that will be transferred to the corresponding station support elements

and so demonstrate that these loads remain within the specified limits for all load cases. This confirmation must be submitted for Sydney Metro review, prior to the commencement of any works. This is required to ensure that the station structure remains capable of supporting the OSD developments, without adverse impact on the station or its operations. The Certifier must not issue a Construction Certificate for the development until written confirmation has been received from Sydney Metro that this condition has been satisfied.

1.2 Copies of any certificates, drawings, approvals or documents endorsed by, given to or issued by Sydney Metro must be submitted to Department of Planning, Housing and Infrastructure for its records prior to the issue of any Construction Certificate.

The Department of Planning, Housing and Infrastructure is also advised that Sydney Metro's conditions are not to be amended, replaced, or superseded without further agreement from Sydney Metro.

Next Steps

If, at any point, the SSD is amended prior to the consent authority's determination, please ensure that the amended SSD and any new or amended supporting documents are provided to Sydney Metro for further assessment. Any amendments to the SSD may alter the impacts of the proposed development on the Sydney Metro City & Southwest rail corridor assessed by Sydney Metro, so Sydney Metro may need to amend any requested conditions.

Noted.

N/A

Sydney Metro would be grateful if a copy of the Notice of Determination and any conditions of consent for the SSD be

forwarded to Sydney Metro should the consent authority determine to grant consent to the SSD.

In the event that the proposed development is the subject of a Land and Environment Court appeal, the consent authority is requested to notify Sydney Metro.

Civil Aviation Safety Authority (CASA)

CASA has reviewed the following EIS:

Noted.

N/A

- Central Precinct 6 November 2025 by Urbis RL 99.65 m Ground plus 25 storeys
- Northern Precinct 7 November 2025 by Urbis Building 1A: 29 storeys (top of plant approx. RL116.9)
- Second Amending Concept 6 November 2025 by Urbis From RL90.4 to RL116.9

The EIS Central Precinct advises: *'An airspace height approval for the building development as a Controlled Activity under the Airports (Protection of Airspace) Regulations 1996 (APAR) has been granted for the overall WMQ Site. The approval was granted on 20 February 2019 ... for maximum approved height of 116.9m AHD.'* Prior to the Approval, CASA assessed the tallest building at height RL116.9 (and recommended an obstacle light on the tallest building).

It is noted that the tallest building in Green Square (OVO ... closer to Sydney Airport) is ~RL 121m. Also, CASA recently did not object to the development at Young Street / Bourke Street at a height of RL 152m.

Eventually, the cranes will need to be assessed under the Airports (Protection of Airspace) Regulations 1996 at the appropriate stage when heights are finalised. Cranes that

infringe PANS-OPS surfaces (Airservices can advise PANS-OPS heights) for more than 3 months will not be approved.

Notwithstanding that CASA is not an Approval Authority, CASA has no objections to the proposal at a maximum building height of 116.9 metres above AHD.

Airservices Australia

At this time, Airspace Development Protection has no comments on the proposed Environmental Impact Statement (EIS). For any further information or clarification, please do not hesitate to contact our team.

Noted.

N/A

Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation Group

Basement Use

CPHR notes that the Central Precinct building and the Northern Precinct (SSD-79307758) are proposed over a shared basement which was approved under SSD-10438. A modification application (SSD-10438-MOD 3) to amend this shared basement has also been lodged and referred to CPHR for advice. Although the shared basement is not included in this SSD application, CPHR reiterates the concerns outlined in the Mod 3 advice letter that habitable uses – such as office spaces – are not suitable for basement levels. In addition, the building's proposed emergency management strategy relies on sheltering in place, and surrounding roads can experience high flood hazards. These factors further increase the risks associated with locating habitable areas within a basement.

Noted. Please refer to the Applicant's response to submissions for the basement application (reference SSD-10438) for further information. **N/A**

Recommendation

Redesign the building to relocate the habitable use – specifically the building management office – which is currently proposed within the shared basement under SSD-10438-MOD 3.

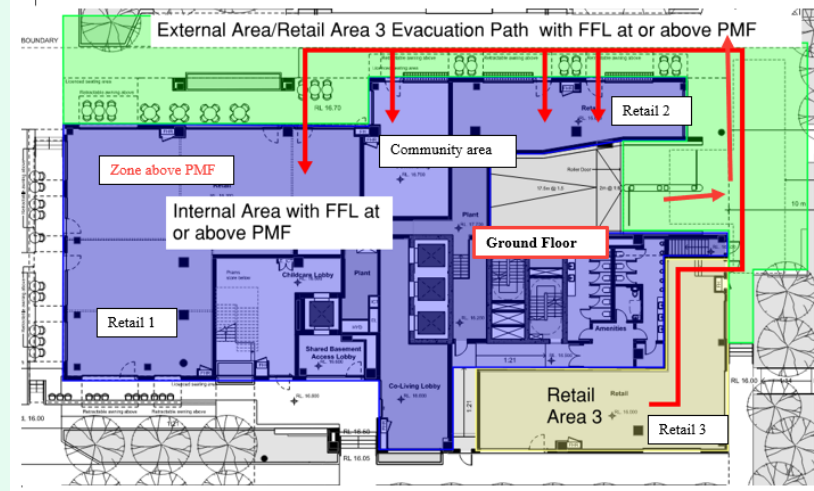
Extent and timing – Prior to determination

Emergency Management

The floor level of Retail Area 3, located in the south-eastern part of the ground floor, as identified in the Central Precinct FIA page 46, has freeboard to the 1% Annual Exceedance Probability (AEP) flood level and is below the Probable Maximum Flood (PMF) level. CPHR notes that Retail Area 3 may not have sufficient warning time to allow for safe relocation to on-site shelter. Internal access to a refuge area should be provided or the floor level raised to be above the PMF level. It should be demonstrated how occupants could feasibly relocate to higher levels considering available warning time and mechanisms to provide warnings.

A Flood Addendum (refer to Appendix F) has been prepared by WSP. The Flood Addendum notes that the proposed development incorporates a podium that raises the ground level along Botany Road and Church Square adjacent to the Congregational Church. The raised Finished Floor Level (FFL) of RL 16.00m AHD provides Retail Area 3 with protection from a 1% AEP flood. To address flood resilience requirements for the Probable Maximum Flood (PMF) level, Retail Area 3 has been provided with a dedicated evacuation exit providing direct egress to Church Lane, which is situated above the PMF level. This evacuation route has an FFL of RL 16.500m AHD, ensuring that occupants can safely relocate to higher ground during extreme flood events.

Appendix F – Flood Addendum



Additionally, the internal layout of the proposed development has been designed with regard to the Shelter-in-place guidelines (CPHR, 2023).

Detailed procedures for occupant evacuation, including warning mechanisms, communication protocols, and expected warning timeframes, will be set out in the Flood Emergency Response Plan for the site. A draft Flood and Emergency Response Plan is included within the Flood Addendum. The draft Flood and Emergency Response Plan has been informed by the Shelter-in-place guidelines (CPHR, 2023) and engagement with NSW SES has commenced in relation to this document. WSP will continue to refine the Flood Emergency Response Plan in consultation with NSW SES following the determination of the Central Precinct SSDA.

A childcare centre is proposed in an area surrounded by flooding greater than 1m in the PMF. The emergency management approach for the childcare centre should be

The Flood Addendum notes that the childcare centre lobby is located at ground floor level and will become surrounded by floodwaters during a PMF event. However, the lobby entrance floor

**Appendix F–
Flood Addendum**

considered in consultation with the NSW State Emergency Service (SES).

level is designed to be RL 16.600M AHD, which is above the PMF flood level.

The Flood Addendum anticipates that under the PMF scenario, the maximum water depth in front of the childcare lobby will be approximately 110mm below the proposed finished floor level of the lobby. Accordingly, occupants within the Childcare Centre lobby will be protected for flood events up to and including the PMF. In extreme flood events, occupants will be able to utilise the internal stairs to take refuge on Level 1.

The Flood Emergency Response Plan for the Central Precinct will provide detailed procedures for childcare and basement occupant evacuation to relocate to on-site shelter, including warning mechanisms, communication protocols and expected warning timeframes. As noted above, engagement within NSW SES has been undertaken and will continue following determination of the SSDA.

Refuge in Level 1 will allow occupants to wait until surrounding floodwaters have receded. Refuge at Level 1 will comply with the requirements of shelter-in-place guidelines for the shelter to be weather protected, structurally stable in the PMG, and have a sufficient floor area for all people likely to be on site at any one time.

Shelter in place Basement car parks should be avoided where a shelter in place strategy is adopted. Details should be provided as to how safety of basement occupants would be achieved in the event of a flood. Shelter in place (SIP) requires the flood impact assessment to address the considerations in the Shelter-in-Place guideline for flash flooding. The NSW SES should be consulted for advice.

Please refer to responses above.

**Appendix F –
Flood Addendum**

Recommendations

Please refer to responses above.

- Provide details on the emergency management approach for occupants that need to relocate to on-site shelter, including the basement.
- Provide details on the emergency management approach for the childcare centre.
- Demonstrate the development’s consistency with the Shelter in-place guideline for flash flooding.
- Consult the NSW SES for advice.

Extent and timing – prior to determination

Disclaimer

CPHR notes that there is a disclaimer on page 136 of the EIS which states “Any unauthorised copying, dissemination or use in any form or by any means other than by the addressee, is strictly prohibited.”

Noted.

N/A

Recommendation

- The consent authority considers the impact of assessing the proposed development with such a disclaimer.

4.2 Response to Special Interest Groups and Public Submissions

Table 3 Response to issues raised by Organisations and Public Submissions

Matters of Concern	Response
Matters Specifically relating to Central Precinct	
The need for additional affordable/social housing	
<p>Co-living development does not meaningfully contribute to the need for more affordable housing for essential works.</p>	<p>The 500 co-living dwellings proposed within the Central Precinct will make a significant contribution to increased housing supply within the Waterloo area and address a growing demand for housing.</p> <p>Co-living accommodation provides a flexible and more affordable type of residential accommodation compared to traditional housing. It responds to contemporary ways of living and caters for a wide range of people that may be unable to access traditional housing products.</p> <p>A significant amount of social housing (comprising 70 dwellings) has been delivered elsewhere within the WMQ site (in the Southern Precinct). Additionally, the proposed Northern precinct development also includes affordable housing.</p>
<p>The Central Precinct is a logical location for public or temporary accommodation during the Waterloo Estate renewal.</p>	<p>Redevelopment of the Central Precinct is envisaged by previous planning approvals for the site as well as the Sydney Metro Quarter Design Guideline. The development of the site is a critical component of the overall vision for Waterloo Metro Quarter and providing a high quality over station development that supports the operation of the new metro station. Utilising the site for public or temporary accommodation during the Waterloo Estate renewal would be inconsistent with this vision and is not viable.</p> <p>Additionally, given the expected construction timing of the proposed development, providing temporary accommodation within the Central precinct will not be feasible.</p>
Management of co-living development	

Matters of Concern	Response
<p>There is no transparent business model or pricing controls to demonstrate better social outcomes from the co-living development compared to the earlier commercial proposal.</p>	<p>The proposed co-living use is fully permissible on the site and responds to current market demands. The proposed co-living use will provide housing diversity by providing a flexible housing product that is suitable for different household typologies. The proposed co-living accommodation will increase housing supply and make a significant contribution to alleviating the existing housing crisis.</p> <p>The social impact assessment prepared as part of the SSDA demonstrates the various positive social impacts that the proposed development will result in.</p>
<p>The risk of co-living building diverted to student housing. Ideally, it is recommended for a condition placed on the co-living building to prevent it being used as student housing for a period.</p>	<p>The proposed co-living housing has been designed to cater for a wide range of people. The co-living asset will allow for a separate and differing offering to the existing student accommodation building in the precinct that would target a wide range of tenants including but not limited to young professionals and recent graduates. Accordingly, the suggested condition is not considered necessary.</p>
<p>The co-living housing should have a suitable management plan to manage 500 co-living tenancies.</p>	<p>An operational management plan will be developed by the Applicant in conjunction with the future operator of the co-living tower. The management plan will be prepared prior to the first occupation of the co-living tower. If considered necessary, this can be secured by way of an appropriately worded planning condition.</p>
<p>Childcare centre should be non-for-profit</p>	
<p>The development does not generate sufficient children to justify for a new childcare centre, if this is to be supported, it should be conditioned to ensure it is a not-for-profit childcare provider and preferably one that is local provider.</p>	<p>The childcare facility will be operated by a not-for-profit provider. It comprises a 'community facility' and complies with the definition set out in the Sydney LEP 2012 and will contribute to the site achieving the minimum</p> <p>The proposed childcare facility will provide in excess of the 2,000 square metre community facilities floorspace requirement for the WMQ site as set out within Clause 6.45 of the Sydney LEP 2012. To comprise a community facility, it must comply with the definition set out in the Sydney LEP 2012:</p> <p><i>“community facility means a building or place—</i></p>

Matters of Concern	Response
	<p><i>(a) owned or controlled by a public authority or non-profit community organisation, and</i></p> <p><i>(b) used for the physical, social, cultural or intellectual development or welfare of the community,</i></p> <p><i>but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation”.</i></p>
Matters relating to the overall WMQ development	
Loss of commercial floor space	
<p>Removal of commercial office and loss of employment generating floor space.</p>	<p>As demonstrated in the Economic Impact Assessment prepared by Urbis, the scale of commercial office previously contemplated is no longer viable in this location, with modelling showing only 4,940sqm of office demand likely by FY35.</p> <p>Notwithstanding, a significant amount of commercial office and other employment generating floor space will continue to be provided on the wider Waterloo Metro Quarter site, which will comprise a contemporary mixed-use development integrated with the new metro station and aligned with market demand.</p> <p>The proposed land uses, including co-living accommodation, are fully permissible and compatible with both the site’s land use zoning and strategic context.</p>
Reduction of community facilities floorspace.	
<p>The proposed provision of only “community facility in the form of a childcare” is inadequate. Childcare does not replace a suitable multi-purpose community hub that offers programs, advocacy, cultural activities, and support.</p>	<p>The proposal is providing a community facility in the form of a childcare centre in the Central Precinct. A Community facility was always proposed and approved as a childcare centre under the previously approved Central SSD 10439. The proposed community facility childcare centre has an area of 2,251sqm, which meets and exceeds the area requirement under clause 6.45 of the Sydney LEP and Concept SSD 9393. The proposed GFA of the community facility childcare centre has increased from the previously approved community facility childcare centre under SSD</p>

Matters of Concern	Response
	<p>10439. Post approval of the Central Precinct SSD, the childcare centre will be registered on title as a community facility.</p> <p>In addition to the childcare centre, WLD also proposed additional areas to be used for community facility (subject to future tenant) within the Southern and Central Precincts.</p>
Inadequate SIA assessment	
<p>The SIA does not address the loss of community facility floor space.</p>	<p>The Social Impact Assessment (SIA) for the Central Precinct addresses the shift in the conceptual land use from residential (market and affordable) to co-living, located above a non-residential podium that will accommodate community facilities and childcare. The maximum permitted GFA will remain unchanged, with floorspace redistributed between the revised Central and Northern Precinct envelopes.</p> <p>The proposal continues to provide a community facility in the Central Precinct in the form of a childcare centre. A community facility was always envisaged and was approved as a childcare centre under the previously approved Central Precinct SSD 10439. The proposed childcare centre has a GFA of 2,251 square metres, meeting and exceeding the minimum area requirements under clause 6.45 of the Sydney LEP and Concept SSD 9393. Following approval of the Central Precinct SSD, the childcare centre will be registered on title as a community facility.</p> <p>The assessment focused on the social impacts arising from the change in land use rather than the redistribution of non-residential floor space. Additional comments regarding the redistribution of community facility floor space between the Central and Northern Precincts are addressed in a separate response to submissions.</p>
<p>The EIS and Social Impact Assessment (SIA) rely on precinct-level averages that mask concentrated disadvantage among social housing tenants immediately adjacent to WMQ.</p>	<p>The submission notes that the EIS and SIA rely on precinct-level averages that may mask concentrated disadvantage among social housing tenants immediately adjacent to the WMQ site.</p> <p>The social locality defined for the SIA reflects the size and scale of the project and the breadth of its potential social impacts. Given the project's capacity to influence</p>

Matters of Concern	Response
	<p>movement patterns, access to services, housing dynamics and public domain use beyond the immediate site, the assessment appropriately considered impacts across a wider surrounding area rather than being limited to land immediately adjacent to the subject site.</p> <p>The Waterloo area is closely compacted with surrounding suburbs and precincts that experience comparatively higher levels of advantage. Including these areas in the social locality was necessary to provide an accurate and balanced representation of the broader community likely to interact with, and be affected by, the proposal.</p> <p>Importantly, the Waterloo South Estate was considered within the overall social and development context of the proposal as part of the assessment. In addition, the analysis of SEIFA data in Section 3.3.6 of the SIA was included to understand patterns of disadvantage across the local area as a whole, including the presence of relative socio-economic disadvantage within the defined social locality. This analysis provides context for identifying where disadvantage is more pronounced and how impacts may be experienced differently across population groups.</p> <p>The use of broader spatial data does not preclude recognition of concentrated disadvantage; rather, it supports a more comprehensive understanding of the social environment within which the proposal would operate.</p> <p>Overall, the approach and methodology adopted for defining the social locality and assessing socio-economic conditions are considered sound and proportionate to the scale of the proposal, and appropriate for identifying potential social impacts and informing mitigation measures</p>
<p>Concerns relating to inadequate SIA assessment and flawed methodology, specially on loss of community facility, the appropriateness of a childcare centre and impact on neighbour public housing estate.</p>	<p>The SIA was prepared in accordance with the DPHI requirements as outlined in the Social Impact Assessment Guideline (2025) and applied a transparent and robust methodology consistent with current industry best practice.</p> <p>The assessment considered social impacts at both the site and broader locality level, including the needs and constraints of communities beyond the immediate Waterloo</p>

Matters of Concern**Response**

area. This broader approach was adopted to ensure that potential cumulative impacts and service catchments were appropriately understood.

In relation to the perceived loss of a community facility, the SIA identified and assessed the existing function of the site and the extent to which it contributes to current community use. The assessment concluded that the proposal would not result in a net loss of community facility provision, noting the availability of alternative facilities within the locality and the limited role of the site in meeting identified community needs.

The suitability of a childcare centre on the site has been assessed using relevant and current evidence, including the City of Sydney Child Care Needs Analysis (2019) and updated demographic data. The analysis builds on earlier work undertaken as part of the Social and Economic Impact Assessment prepared by Urbis in 2020, and addresses limitations in previous demographic assumptions by applying updated population projections and industry benchmarks.

The assessment demonstrates an ongoing need for childcare services within the broader catchment and confirms the appropriateness of the proposed use. The SIA also identifies demand for community services such as childcare and community facilities, noting that existing facilities are often poorly located and do not meet contemporary work health and safety standards. The SIA addresses the limited availability of affordable, non-commercial spaces for vulnerable communities, together with funding constraints, further limits service provision.

Potential impacts on the neighbouring public housing estate were also explicitly considered. The SIA examined issues such as amenity, access, safety and compatibility of uses. Mitigation measures were identified where relevant, and the assessment concluded that any potential impacts would be manageable and not result in adverse social outcomes for residents

Matters of Concern	Response
<p>To ensure social equity, the application should:</p> <ul style="list-style-type: none"> • Prepare and adopt a Waterloo-wide Social Infrastructure and Governance Plan. • Set measurable social outcome KPIs. 	<p>The submission requests that, to ensure social equity, the application should prepare and adopt a Waterloo-wide Social Infrastructure and Governance Plan and set measurable social outcome KPIs.</p> <p>These matters are outside the scope of this SIA. The purpose of the SIA is to identify and assess potential social impacts associated with the proposal and to outline mitigation and management measures relevant to the development. Strategic, precinct-wide social infrastructure planning and governance arrangements extend beyond the remit of an individual SIA.</p> <p>Matters relating to social equity can be more appropriately addressed through the preparation of a Social Impact Management Plan (SIMP), which is the suitable mechanism for translating SIA findings into implementation actions over time. A SIMP can outline commitments, responsibilities and monitoring processes to support equitable outcomes during development and operation.</p> <p>The inclusion of measurable social outcome KPIs is also more appropriately addressed within a SIMP, where indicators can be clearly defined, monitored and reviewed over the life of the project, rather than within the impact assessment itself.</p> <p>Accordingly, while social equity considerations have informed the SIA analysis, the preparation of a Waterloo-wide Social Infrastructure and Governance Plan and the establishment of KPIs are not proposed as part of this SIA and would be considered, where relevant, through subsequent management and implementation framework</p>
<p>Reducing overshadow to park and future park</p>	
<p>Minimise the impact of the development on future Waterloo Park, especially in the afternoon.</p> <p>The submission acknowledges marginal improvements in overshadowing by the development on the proposed park.</p>	<p>Overshadowing analysis undertaken by RWDI demonstrates that the entire future Waterloo Park will receive at least two hours of sunlight between 09:00 – 15:00 at mid-winter. The proposed WMQ development therefore complies with the relevant criteria of the Waterloo Design and Amenity Guideline.</p>
<p>Management of public domain areas</p>	

Matters of Concern	Response
<p>How public assessable space on the site was to be managed – it will be important that the new plaza and the adjoining public domain in the Central and Northern Precincts is sensitively managed in the social context of the site – recommends for a public space management plan to be conditioned.</p>	<p>The publicly accessible space will be managed by the Building Management Committee who will appoint a Shared Facilities Manager.</p>
<p>Protect public domain character: CPTED, public realm management (no privatisation), and signage controls.</p>	<p>The public domain has been designed in consultation with Sydney Metro and the DRP to ensure the character of the public domain is protected.</p>
<p>Affordable housing should be provided in perpetuity</p>	
<p>Affordable housing should be provided in perpetuity, preferably with rent set as percentage of income affordable housing rather than discount off market affordable housing.</p>	<p>This comment is not relevant to the Central Precinct SSDA. It is addressed in the Northern Precinct Submissions Report.</p>
<p>Public consultation/engagement</p>	
<p>Running four concurrent exhibitions at one site across a holiday window is neither accessible nor democratic for predominantly public-housing communities.</p>	<p>The exhibition of the proposals was undertaken in accordance with the statutory requirements of the EP&A Act and relevant Departmental Guidelines.</p> <p>Due to the exhibition period coinciding with the holiday window, the proposals were subject to an extended exhibition period of 50 days.</p>
<p>There is a lack of integration between WMQ and Waterloo South planning, which risks fragmented outcomes.</p> <p>Existing co-governance bodies (e.g., Waterloo Human Services Collaborative) and the developer’s panel were not engaged meaningfully.</p>	<p>The Waterloo South precinct is currently in a planning concept phase. The proposed development on the WMQ site is more advanced in order to support the delivery of the metro site.</p> <p>Notwithstanding, the Applicant is committed to communications with the relevant parties to assist where possible.</p>
<p>Parking management</p>	
<p>Zero parking for ~500 co-living rooms and ground-floor retail may exacerbate local parking stress.</p>	<p>The proposed parking provision is fully consistent with the Sydney LEP 2012 and fully appropriate for the site given its proximity to public transport (including the Waterloo</p>

Matters of Concern	Response
<p>Bicycle parking numbers must be paired with safety, theft-prevention, and end-of-trip facilities.</p> <p>Servicing and childcare drop- must be actively managed.</p>	<p>Metro station), pedestrian and cycle networks and the range of services within Waterloo.</p> <p>Bicycle parking is provided in the site-wide basement (reference SSD-10438) with secure access, end of trip facilities, and CPTED-aligned design. Servicing and childcare drop-off will be managed under a Freight and Servicing Management Plan.</p> <p>A Freight and Servicing Management Plan has been developed and was included as an Appendix to the TIA submitted with the EIS to ensure servicing is actively managed.</p>
<h3>Connecting with Country</h3>	
<p>Commit to Connecting with Country through governance and programming, not only landscape gestures.</p>	<p>The proposal recognises the importance of Connecting with Country. Connecting to Country principles have guided the design of the Central Precinct, and the broader WMQ precinct. The approach to Connecting with Country will continue to be considered as the design and operational aspects of the development are further refined.</p> <p>The Connecting to Country framework has been prepared and submitted with the Concept Plan and Northern Precinct Detailed application, and is incorporated into the Supplementary Design Report for the Central Precinct.</p>
<h3>Recommended measures to be adopted during construction and demolition</h3>	
<p>To incorporate the following mitigation measures during demolition and construction:</p> <ul style="list-style-type: none"> • Dust and Noise Mitigation • Enhanced Pest and Waste Control • Asset Recycling and Sustainable Waste Management • Security as Education • Ensure consistent communication and provide community support measure. • Develop a localised mental health response plan in partnership with Sydney Local Health District and NGOs. 	<p>A range of mitigation measures are proposed to minimise the impacts of the construction phase of the proposed development as detailed in Appendix JJ of the EIS. The mitigation measures are based on robust technical assessments of the environmental impacts of the proposed development. In addition, appropriate training will be provided for the delivery team to ensure the safety and well-being of the public and site personnel.</p>

Matters of Concern	Response
<ul style="list-style-type: none">• Promote existing community centres and libraries as official respite spaces during working hours.• Form a complementary or integrated collaborative governance framework with the Waterloo Redevelopment Group and Waterloo Human Services Collaborative to monitor mitigation strategies.• Explore community-building initiatives such as a “Demolition Countdown” art project, pop-up chill-out stations, and resident-led temporary fencing art to foster ownership and reduce stress.• Where feasible, repurpose cleared sites for temporary accommodation or community use to minimise displacement and maintain social networks.• Developer to establish a trauma informed program aimed at training workers in de-escalation and dealing with people with complex mental health and other issues who lives in the area.	

5 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole:

- **Project design** – A minor refinement is proposed to the design of the terrace located at Level 03. Notwithstanding, the proposed development responds to and is fully consistent with the second amending concept SSDA submitted concurrently with the Central Precinct SSDA. Building 2 will comprise a high-quality and contemporary development that is fully compatible with its surrounding context. The mix of uses proposed responds to market conditions and addresses an urgent need for more housing, including an anticipated growth in the co-living sector.
- **Strategic Planning Consistency** – All levels of strategic planning seek to facilitate additional housing (including diverse and affordable housing) and 'transit-oriented development'. The proposal is consistent with this core objective of the strategic planning framework by delivering 500 co-living housing units in a highly accessible location above Waterloo Metro Station. The development will result in an orderly and economic use of the land that leverages significant NSW Government investment in public transport to the site, specifically Sydney metro.
- **Statutory Planning Consistency** – No changes are proposed to the development. Accordingly, for the reasons set out within the EIS, the development remains consistent with the statutory planning framework.
- **Community Views** – Community views received during the public exhibition and have been considered as detailed within this report.
- **Environmental Impacts** – The environmental impacts of the proposed development remain unchanged from those previously assessed as part of the EIS. The EIS concluded that the potential impacts identified can be mitigated, minimised or managed through the mitigation measures identified. No changes are proposed to the mitigation measures previously proposed. For completeness, the mitigation measures table previously submitted with the SSDA is provided at **Appendix J**.
- **Suitability of the Site** – As detailed within the EIS, the proposal is suitable for the site as it delivers a world-class integrated public transport and mixed-use development, which aligns with relevant strategic and statutory planning policies and significant NSW Government investment in public infrastructure. The proposed development is permissible and will be successfully integrated within the Waterloo Metro Station.
- **Public Interest** – The proposed development is considered to be in the public interest for the reasons identified in Section 7.7 of the EIS. The proposal will contribute to a vibrant and landmark development and will address a growing requirement for co-living housing on a well-located site. The proposal supports the '30 minute' city concept, will deliver a significant number of jobs on site, and incorporates a range of sustainability initiatives.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed clarifications. The refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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