18th February 2026

Sam Hui

WL Developer Pty Ltd

78-82 Wyndham Street

Alexandria, NSW 2051

Dear Sam

## Waterloo Metro Over Station Development,

## Northern Precinct (SSD-79307758) and Central Precinct (SSD-79307746)

**ptc.** has been engaged by WL Developer Pty Ltd to provide traffic engineering services in relation to the proposed Waterloo Metro, Over Station Development, Second Amending Concept (SSD-79307765), Northern Precinct (SSD-79307758), Central Precinct (SSD-79307746) and Waterloo Basement Modification (SSD-10438-Mod-3).

The following memorandum is provided in response to the traffic related comments received from Transport for New South Wales (TfNSW) on 20th January 2026, which specifically relates to Northern Precinct (SSD-79307758) and Central Precinct (SSD-79307746). TfNSW did not provide any comments for the Second Amending Concept (SSD-79307765) and conditions were recommended for the Waterloo Basement Modification (SSD-10438-Mod-3), which the applicant accepts.

## 1. TfNSW Comments and ptc. / WLD Response

### Loading and Deliveries

***TfNSW Comment, Item 2**:*

*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.*

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

**ptc./WLD Response, Item 2:**

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 below table outlines the servicing provisions as informed by the TfNSW Urban Freight Forecaster and the proposed design:

| **Service Bay Type** | **TfNSW Urban Freight Forecaster** | **Proposed Design** |
|---|---|---|
| Small Bays | 5 | 5 |
| Medium Bays | 2 | 1 |
| Large Bay | 1 | 2 |
| **Total** | **8** | **8** |

This proposed design meets the recommended total number of bays while delivering an overall increase in larger-format servicing capacity. Larger bays can accommodate all smaller vehicle types, resulting in a more flexible and operationally resilient loading dock arrangement that can manage peak demand across both the Northern and Central Precincts.

***TfNSW Comment, Item 2 (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 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.*

**ptc./WLD Response, Item 2 (a):**

The largest service 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 (refer to Figure 1).

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 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.

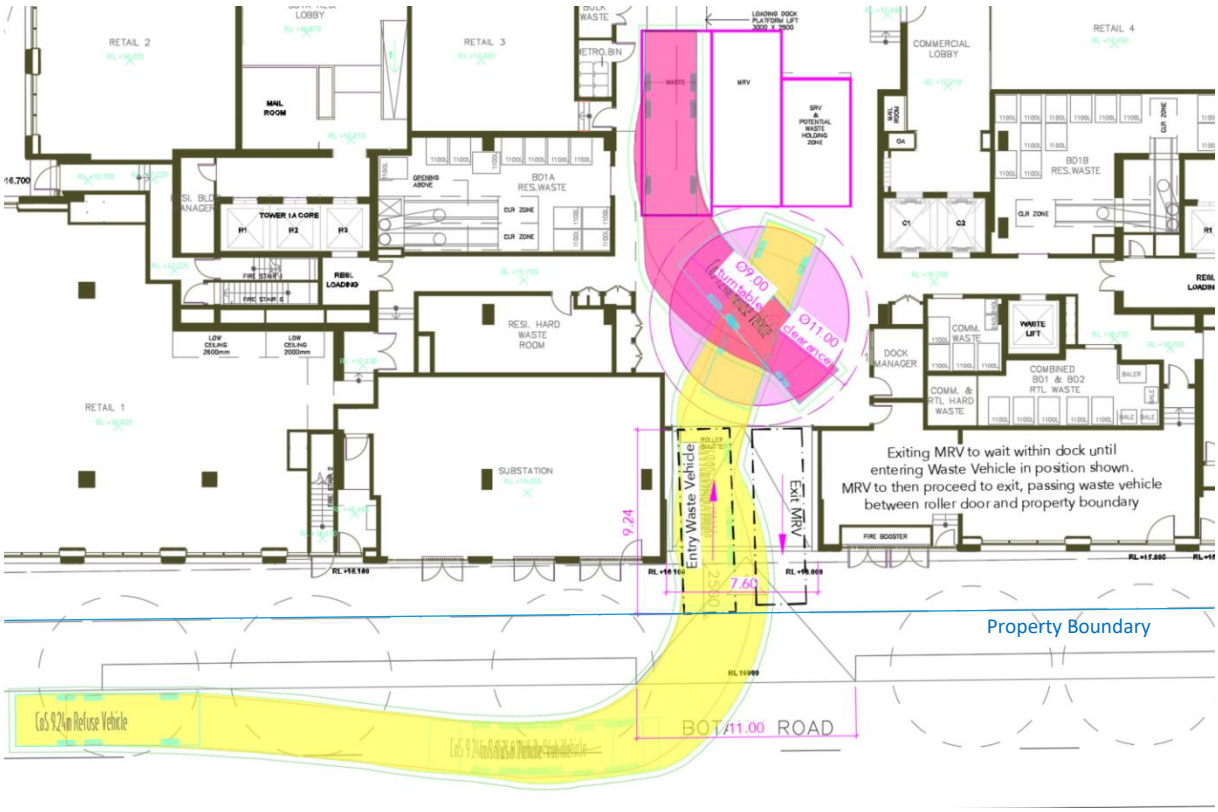


Figure 1 – CoS waste vehicle and MRV passing within property boundary.

***TfNSW Comment, Item 2 (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.*

**ptc./WLD Response, Item 2 (b):**

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 obstruction to the public footpath, and the arrangement complies with the sight distance requirements prescribed in AS2890.2 – Figure 3.4 (refer to Figure 2).

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.

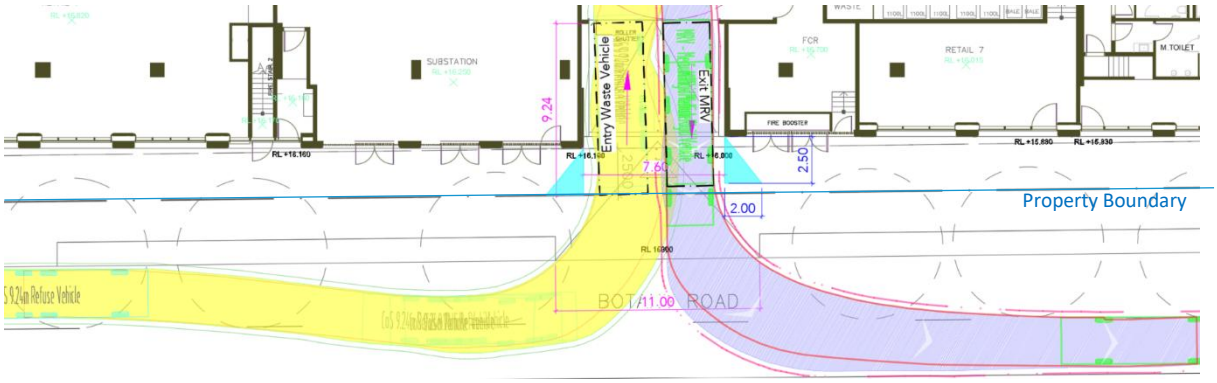


Figure 2 – Visibility Splays

***TfNSW Comment, Item 2 (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 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.*

**ptc./WLD Response, Item 2 (c):**

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 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.

***TfNSW Comment, Item 2 (d):***
*There is a substantial separation between the retail, commercial, and residential uses within the Central Precinct and the shared loading dock located in the northern precinct. This separation is likely to increase the duration that service vehicles associated with Building 2/the Central Precinct occupy the loading dock area.*

***TfNSW Comment, Item 2 (e):***
*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.*

**ptc./WLD Response, Item 2 (d & e):**

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 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.

***TfNSW Comment, Item 2 (f):***
*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.*

**ptc./WLD Response, Item 2 (f):**

Noted. The Proponent will accept a condition to develop a detailed Delivery and Servicing Plan in consultation with TfNSW prior to issuing of the relevant Construction Certificate.

## Green Travel Plan

***TfNSW Comment, Item 4:***

*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:*

***TfNSW Comment, Item 4 (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.*

***TfNSW Comment, Item 4 (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.*

***TfNSW Comment, Item 4 (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 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.*

**ptc./WLD Response, Item 4, 4 (a), 4 (b), 4 (c):**

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

***TfNSW Comment, Item 4 (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/.*

*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.*

**ptc./WLD Response, Item 4 (d):**

Noted. The Proponent 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.

***TfNSW Comment, Item 4 (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.*

**ptc./WLD Response, Item 4 (e):**

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

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

***TfNSW Comment, Item 4 (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.*

**ptc./WLD Response, Item 4 (f):**

Noted. The Proponent will accept a condition to appoint a Travel Coordinator prior to occupation.

If you require additional information, please do not hesitate to contact us.

Yours faithfully

Steve Wellman,

Project Director

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Document Control: Prepared by *JJ* on *18 February 2026*. Reviewed by *SW* on *18 February 2026*.