

Response to Submissions

Waterloo Metro Quarter – Northern Precinct (SSD-79307758)

March 2026

Prepared for: WL Developer Pty Ltd



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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.

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1 Introduction

This Submissions Report relates to the State significant development application (**SSDA**) for the detailed design of the Over Station Development (**OSD**) located within the northern precinct of the Waterloo Metro Quarter (**WMQ**) at 150 Cope Street, Waterloo (the **site**). On behalf of WL Developer Pty Ltd (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in November 2025 (SSD-79307758). The SSDA was placed on public exhibition for 50 days between 27 November 2025 and 15 January 2026.

This Submissions Report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1 Exhibited Project

The exhibited proposal sought consent for the detailed design, construction and operation of a mixed-use development comprising two residential towers atop a commercial / retail podium to be constructed within the northern precinct of the WMQ site, adjacent to the Sydney Metro Waterloo Station.

The exhibited project specifically sought development consent for:

- A four-storey podium containing:
 - Loading dock facilities and other building infrastructure (i.e. electrical substation, fire control rooms etc) accessed off Botany Road.
 - Vehicular entry to basement parking and service vehicles accessed from Cope Street via Church Square.
 - Ground level retail tenancies, commercial and residential lobbies.
 - Three levels of commercial office floorspace, totalling 4,915sqm (including the commercial lobby at ground floor).
- Two residential apartment towers with a total of 314 units, comprising 39 affordable housing units and 275 market units,
 - Building 1A: 29 residential storeys including plant (top of plant approx. RL116.9)
 - Building 1B: 26 residential storeys including plant (top of plant approx. RL 107.5)
 - Communal amenity and open space located on the roof of the Metro box connected to the podium roof garden on Level 4 via a bridge link over Raglan Walk
- Delivery of an open to the sky north-south pedestrian thoroughfare through the site, landscaping and public domain works.

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	Woods Bagot
Appendix C	Updated Architectural Drawings	Woods Bagot
Appendix D	Civil Engineering Memo	Robert Bird Group (RBG)
Appendix E	Traffic Engineering Memo	ptc
Appendix F	Wind Engineering Memo	RWDI
Appendix G	Supplementary Landscape Design Response	Aspect Studios
Appendix H	Community Housing Provider Letter	Link Wentworth
Appendix I	Flood Risk Memo and the Flood Emergency Response Plan	WSP
Appendix J	Fire Engineering Letter	Stantec
Appendix K	Updated Clause 4.6	Urbis
Appendix L	Revised Statutory Compliance Table	Urbis
Appendix M	Mitigation Measures (no change)	Urbis
Appendix N	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.

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 northern 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.

Special Interest Groups and Public Submissions

During public exhibition, seven (7) public submissions were received, including:

- Two (2) submissions from community interest groups
- Five (5) submissions from individual members of the local community.

Of the public submissions, two submissions were received in support (29%), one submission objected (14%), and four submissions were neutral/provided a comment (57%).

The key issues raised in the submissions can be broadly grouped into the following categories:

- Issues relating specifically to the northern precinct:
 - Affordable housing should be provided in perpetuity
 - Impact on amenity
 - Construction staging and interface with the operating station
 - Quality of design
 - Loss of commercial floor space

- Traffic impact
- Increase height to provide more public / key workers housing.
- Matters relating to the overall WMQ development
 - Reduction of community facilities floorspace
 - Inadequate SIA assessment
 - Overshadowing to public space
 - Management of public domain areas
 - Public consultation / engagement
 - Parking management
 - Connecting with Country
 - Recommended measures to be adopted during construction and demolition.

Based on the above categories, this Submissions Report provides a response to the key issues at **Section 3**.

2.1 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**.

2.2 Further Engagement

The Applicant met with the Department on two occasions throughout the Response to Submissions (RTS) report preparation to discuss the key issues raised in the agency, Council and public submissions and the proposed approach to responding.

2.3 Refinements to the Project

In response to the concerns raised in submissions, minor refinements have been made to the proposal including:

- Relocating the building office managers office from the basement to the Level 1 to address flooding impacts.
- Increase in riser size to all commercial levels and plantroom on Level 3, reducing the non-residential GFA by approximately 8 sqm.
- A minor adjustment to the residential GFA (+41 sqm) following a review of the measurement methodology with the surveyor. While service risers can be excluded from GFA, the surveyor confirmed that the adjoining structural columns and walls must be included. The residential GFA has therefore been adjusted to reflect this.

These amendments do not impact on the compliance of GFA across the OSD. The total revised GFA across Southern, Northern and Central OSD is 68,747sqm, which is below the approved GFA under the Concept SSD, which is 68,750m² excluding station floor space.

2.4 Additional Impact Assessment

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Supplementary Design Report prepared by Woods Bagot
- Updated Architectural Drawings prepared by Woods Bagot
- Civil Engineering Memo prepared by RGB Civil
- Traffic Engineering Memo prepared by ptc
- Wind Engineering Memo prepared by RWDI
- Supplementary Landscape Design Response prepared by Aspect Studios
- Community Housing Provider Letter prepared by Link Wentworth
- Flood Risk Memo and Flood Emergency Response Plan prepared by WSP
- Fire Engineering Letter prepared by Stantec
- Updated Clause 4.6 prepared by Urbis

- Revised Statutory Compliance Table prepared by Urbis
- Revised Mitigation Measures Table prepared by Urbis
- Connecting with Country Guidelines prepared by Murawin.

The findings and recommendation of the additional assessments are discussed in detail within **Section 3** of this report.

3 Responses to Submissions

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-79316758).

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.

3.1 Response to DPHI, Agencies and Council

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

Issue Raised	Response	RTS Reference
Department of Planning, Housing and Infrastructure		
Statutory Compliance		
a) 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).	The maximum permissible GFA permitted under the Concept Approval is 68,750sqm. The broader WMQ development includes 68,747 sqm of site wide GFA, 32,517 sqm of which is attributed to the northern precinct. Therefore, the proposal achieves consistency with the maximum GFA permitted under the Concept Approval. Gross floor area diagrams are provided in the updated Architectural Drawings. Refer to the central precinct RTS report for responses relating to central precinct gross floor area (GFA) calculations.	Appendix C – Updated Architectural Drawings
b) 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.	The change to the non-residential GFA is a result of ongoing design development, which includes the additional plant and riser spaces now required. A revised The design refinements to the northern precinct have resulted in a minor additional reduction to the non-residential GFA, by	Appendix B – Supplementary Design Report Appendix K – Updated Clause 4.6 Request

	approximately 8sqm, due to the increase in riser size to all commercial levels and plantroom on Level 3. A Revised Clause 4.6 has been prepared (refer to Appendix K) to reflect the proposed variation.	
c) 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 L – Revised Statutory Compliance Table
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 standards contained in Part 3 of Chapter 3 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).	The co-living units are included as part of the central precinct of the Waterloo Metro Quarter. Please refer to the RTS for SSD-79307746.	N/A
Affordable Housing		
Provide the name and ABN of the registered community housing provider that will be responsible for managing the Northern Precinct affordable housing component, along with documentation confirming the provider's agreement to this responsibility (SEARS 22 requirement).	A letter from the Community Housing Provider, Link Wentworth, has been provided at Appendix H.	Appendix H – Community Housing Provider Letter
Public Benefit – Community Facilities		
Submit further information to demonstrate that the proposed community facilities meets 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 community facility forms part of the central precinct SSDA. Please refer to the RTS for SSD-79307746.	N/A

-
- 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
-

Design Integrity Reports

- d) 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

A Supplementary Design Report has been prepared by Woods Bagot to respond to the matters raised by DPHI.

The Northern Precinct enhances the public domain by introducing new pedestrian links, landscaped areas, and a diverse mix of retail offerings. The ground plane is designed with active frontages on all sides, reducing non active edges and improving amenity and safety through increased passive surveillance.

Ground level retail tenancies are supported by a centrally located shared loading dock accessed from Botany Road. Most tenancies connect directly to the loading area via a back of house corridors. Three smaller tenancies on Raglan Walk will access the loading area via the laneway; given their scale, delivery volumes are expected to be low and will be managed outside peak public hours.

Access to the northern precinct retail amenities is via Grit Lane, where food and beverage tenancies are located in close proximity, providing convenient access for patrons. The central precinct has its own dedicated shared amenities to service retail tenancies located in the central precinct. All retail units are equipped with adequate ventilation, with kitchen exhausts provided to all units except Retail 7, as it is not intended to be a food and beverage premises.

Appendix B –
Supplementary
Design Report

– 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: <i>Ensure that vehicles leaving the loading bay have sufficient line of sight to exit the building safely, noting the high number of pedestrians using this footpath.</i>	A Traffic Engineering Memo has been prepared by ptc to address the matters raised by TfNSW. 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 the Traffic Engineering Memo). 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 E – Traffic Engineering Memo
– 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.	The northern precinct of the Waterloo Metro Quarter (WMQ) has been intentionally designed to embed the guiding principles of the Connecting with Country framework developed by Murawin, the Indigenous consultants working closely across the broader WMQ project. The Connecting with Country Guidelines centred methodology established by Murawin, ensures that Aboriginal and Torres Strait Islander knowledge, values, and cultural practices are meaningfully integrated. The Northern Precinct design directly responds to this framework, recognising and honouring Country through its planning, architecture, and landscape strategies. The design of the northern precinct has integrated key Connecting with Country Principles including design for everyone and celebrate local culture and pride. Refer to the Supplementary Design Report for additional information.	Appendix B – Supplementary Design Report

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:
- i. 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
 - ii. A standing criteria for Grit Lane between Botany Road and the southern station entrance (Sensor locations 25, 50 and 52)
 - iii. A standing criteria for the corner of Botany Road and Raglan Street (Sensor locations 59, 60 and 62)
 - iv. 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)

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 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

Appendix F – Wind Engineering Memo

	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 Wind Impact Assessment submitted with the EIS.	
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.	The Wind Engineering Memo prepared by RWDI details how the requirements of Condition B14 of the concept approval are met by the proposal. Condition B14 of the Concept Approval requires that standing pedestrian comfort be achieved at waiting zones at nominated intersection crossings (sensor locations 4, 38 and 61). Wind tunnel testing confirms that, under the built-form scenario, standing comfort criteria are already achieved at Location 4. At Location 38, standing comfort is achieved for 94% of the time, which is marginally below the 95% guideline target.	Appendix F – Wind Engineering Memo

The wind tunnel testing undertaken for the mitigation configuration, which incorporates the proposed landscaping and wind-mitigation measures included in the current design, demonstrates improved wind conditions at these locations. With these measures in place, sitting to standing comfort levels are achieved.

Accordingly, the proposed development satisfies the WMQ wind comfort guidelines and meets the requirements of Condition B14 of the Concept Approval.

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

A Flood Risk Memo has been prepared by WSP to address the matters raised by CPHR.

Flood modelling for the Northern Precinct has been updated to address climate change impacts using a 30 per cent increase in design rainfall intensity (climate change sensitivity), consistent with the latest Australian Rainfall and Runoff (June 2024). The results confirm that Retail Areas 1 and 2 have finished floor levels above the 1% AEP flood level under climate change conditions. Retail Areas 6 and 7 are marginally below the 1% AEP level (20–30 mm), however both areas have direct internal access to refuge areas located above the Probable Maximum Flood (**PMF**). The adopted floor levels remain consistent with City of Sydney requirements and appropriately manage flood risk.

The Supplementary Design Report details that the building management office has been relocated from the basement to Level 1.

A response to matters related to the central precinct will be included in the RTS for SSD-79307746.

A Flood Emergency Response Plan will be prepared and implemented prior to occupation. Engagement with the NSW State

Appendix B –
Supplementary
Design Report

Appendix I – Flood
Risk Memo

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	Emergency Service has commenced and will continue as part of the refinement of the Flood Emergency Response Plan.
e) Any emergency management and evacuation strategy should be prepared in accordance with the Shelter-in-Place Guidelines for Flash Flooding and in consultation with NSW SES.	

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 to identify the proposed changes to the concept approval and is appended to the RTS report provided with SSD-79307765.	N/A
b) Identify changes required to the Waterloo Metro Quarter Design and Amenity Guidelines consequential to the Second Amending Concept	Urbis has reviewed the Waterloo Metro Quarter Design and Amenity Guidelines (the guideline) against the Second Amending Concept SSD, and have identified the following changes required to the Guideline to ensure consistency across the new detailed SSD applications: 1. Revise the date of the guideline 2. Remove all yellow highlights that were from the previous amendment to avoid confusion 3. Replace reference of 'three towers' with 'all towers' throughout the document 4. Where figures depict the built form massing, add the following wording in the figure description 'indicative built forms shown'. 5. Update public domain diagrams to reflect the amended public domain layout	N/A

	6. Add a new control for co-living bicycle parking. No changes are proposed to design objective or guidelines. The proposed changes are inconsequential to the design quality and amenity of the Detailed SSDs.	
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.	A Fire Engineering Statement has been prepared by Stantec to demonstrate compliance with Condition A20 of the Concept Approval. The Fire Engineering Statement has been informed by the BCA and DDA Reports 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. A Fire Engineering Brief Questionnaire will subsequently be prepared and submitted to Fire and Rescue NSW following determination of the SSDA and will specify the proposed performance requirements and solutions for the proposal.	Appendix J – Fire Engineering Statement
d) Provide details of consultation undertaken with the Waterloo Congregation Church, including issues raised and project response.	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 was also invited to attend a community webinar on 3rd September 2025. 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 DA for works to enhance the church grounds on behalf of the Church. Primary commentary from the Church relate to on-going construction interface, which will be managed as outlined by the CEMP and completion timing of the OSDs. No other items were raised.	N/A

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 NSW (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,

A Civil Engineering Memo has been prepared by Robert Bird Group to address the comments raised by TfNSW in relation to drainage. The Civil Engineering Memo includes detailed engineering drawings and hydraulic calculations of the pre-development and post-development stormwater discharge to Botany Road which have been submitted to TfNSW. 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.

TfNSW have advised Robert Bird Group that at this stage, only pre-lodgement advice can be provided, as development consent approval has not yet been granted.

Appendix D – 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.	Robert Bird Group is currently awaiting formal feedback or acceptance of the submitted information.	
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.	A Traffic Engineering Memo has been prepared by ptc to respond to the issues raised by TfNSW. The Traffic Engineering Memo outlines that 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 demand generated by both precincts, ensuring the proposed bay provision aligns with the combined requirements of the development. The proposed design meets the recommended total number of bays according to the Freight Forecaster 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.	Appendix E – Traffic Engineering Memo
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	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 Appendix D for swept path analysis.	

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.	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.	
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 obstruction to the public footpath, and the arrangement complies with the sight distance requirements prescribed in AS2890.2 – Figure 3.4. Refer to Appendix D for swept path analysis. 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 E – Traffic Engineering Letter
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	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	Appendix E – Traffic Engineering Letter

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.	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.	
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	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.	Appendix E – Traffic Engineering Letter

vehicles that will need access to the shared loading dock, given their size.	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. 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.	
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	Noted. The Applicant will accept a condition to develop a detailed Delivery and Servicing Plan in consultation with TfNSW prior to issuing of the relevant Construction Certificate.	Appendix E – Traffic Engineering Letter

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](#).

Bicycle Parking

TfNSW supports the provision of bicycle parking for visitors, staff and people residing in the Waterloo Metro Quarter. It is, however, unclear to TfNSW why the Northern Precinct development is proposing bicycle parking to service the development within the Botany Road road reserve (refer to Figure 20 in Appendix R). Any bicycle parking required for the use of this development should be provided external to the Botany Road road reserve and wholly within the property boundary.

A Supplementary Landscape Design Response has been prepared by Aspect Studios to respond to the comments raised by TfNSW.

The proposed bicycle hoops and their locations were previously reviewed and approved by both DPHI and TfNSW as part of the previously approved proposal and are considered an appropriate and endorsed outcome.

The bicycle parking is intended to serve visitors to the precinct and the broader public, rather than being restricted to site patrons. For this reason, bicycle parking has been planned at a precinct scale and integrated within the public domain, with locations informed by anticipated use, desire lines, visibility and passive surveillance.

Alternative bicycle parking locations within the Northern Precinct have been explored. Due to limited space within the property boundary, relocation would require the removal of seating, placement of more bicycle parking within permeable paving areas along Raglan Street, or consolidation adjacent to the building facade, each resulting in a poorer public domain outcome and reduced pedestrian amenity.

The existing bicycle parking locations provide a balanced outcome that supports accessibility and safety while maintaining the quality and functionality of the surrounding public realm.

Appendix G –
Supplementary
Landscape Design
Response

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:

- e) 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.
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- f) 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.
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- g) 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
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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.

Appendix E –
Traffic Engineering
Letter

these helpful reference materials from our NSW Government Travel Demand Management website – Examples of hard activities and Example of soft activities.

h) 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/.	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.	Appendix E – Traffic Engineering Letter
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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.		
i)	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.	A preliminary travel 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 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.	Appendix E – Traffic Engineering Letter
j)	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.	Noted. The Applicant will accept a condition to appoint a Travel Coordinator prior to occupation.	Appendix E – Traffic Engineering Letter

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. 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.	Noted.	N/A
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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. 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	Noted. The Applicant is willing to accept the recommended conditions of consent.	N/A
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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 (CPHR)

Basement use

CPHR notes that the Northern Precinct building and the Central Precinct (SSD-79307746) 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.

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

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 increase the risks associated with locating habitable areas within a basement.

Recommendation

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

Flood planning levels and climate change

CPHR notes that several areas of the development have floor levels with no or less than 100mm freeboard to the 1% Annual Exceedance Probability (AEP) flood level. Climate change, including that which has already occurred, may increase flood levels to the degree that proposed floor levels would no longer be above the 1% AEP flood level. A climate change sensitivity analysis was carried out in the Northern Precinct FIA using a 10% increase in rainfall intensity, which resulted in small increases to the 1% AEP flood level that would not impact on proposed floor levels. However, the 10% increase is not consistent with the latest guidance per Australian Rainfall and Runoff (ARR). It is likely that greater increases in flood levels would be predicted with the latest methodologies. By contrast, CPHR considers the approach for Areas 17 and 18 outlined in the Northern Precinct FIA to be reasonable, given the floor level which is below the flood planning level comprises a corridor leading to the fire stairs and does not constitute a habitable area.

Recommendations

- Apply freeboard to the retail floor levels.
- Alternatively, use the latest methodologies in Australian Rainfall and Runoff to develop more accurate estimates of changes to flood levels under climate change conditions.

A Flood Risk Memo has been prepared by WSP to respond to the comments raised by CPHR.

Flood modelling for the Northern Precinct has been undertaken in accordance with City of Sydney requirements. The adopted flood planning level and finished floor levels were developed using the City's Interim Floodplain Management Policy, following direct consultation with Council's flood engineer prior to lodgement.

In response to CPHR's comments, additional flood modelling has been carried out using a 30 per cent increase in rainfall intensity, consistent with the latest guidance in Australian Rainfall and Runoff (June 2024). This modelling provides a conservative assessment of potential climate change impacts on flood levels.

The updated modelling confirms that:

- Retail Areas 1 and 2 have finished floor levels above the 1% AEP flood level, even when a 30 per cent climate change allowance is applied.
- Retail Areas 6 and 7 are marginally below the 1% AEP flood level under the 30 per cent climate change scenario, by approximately 20 mm and 30 mm respectively.

The Flood Engineer considers that these exceedances are minor and do not give rise to unacceptable risk. Areas 6 and 7 have direct access to internal refuge areas that are located above the Probable Maximum Flood level, ensuring safe egress during extreme flood events. Similar minor exceedances have been supported in other approved developments.

Overall, the proposed finished floor levels are consistent with City of Sydney requirements and have been tested against both current

Appendix I – Flood Risk Memo

	policy and the latest climate change guidance. The additional modelling demonstrates that the development appropriately manages flood risk and responds to climate change considerations.	
Emergency Management Several areas of the development have floor levels that provide less than 100mm freeboard to the 1% AEP flood level and are below the Probable Maximum Flood (PMF) level. Internal access to a refuge area should be provided or the floor level should be raised 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. CPHR notes that several areas may not have sufficient warning time to safely relocate to on-site shelter. Internal access to a refuge area should be provided. 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 State Emergency Service (NSW SES) should be consulted for detailed advice. Recommendations ▪ Provide details on the emergency management approach for occupants that need to relocate to on-site shelter, including the basement. ▪ Demonstrate the development's consistency with the Shelter-inPlace guideline for flash flooding.	Section 7 of the Flood Impact Assessment submitted with the EIS demonstrates that occupants of the northern precinct can safely respond to a flood emergency. While some ground-level retail areas have floor levels below the Probable Maximum Flood (PMF), all of these areas are provided with direct internal access to refuge areas that are located above the PMF and can be used as shelter in place. A Flood Emergency Response Plan has also been prepared and is appended to the Flood Risk Memo. Engagement with the NSW State Emergency Service has commenced and will continue as part of the refinement of the Flood Emergency Response Plan.	Appendix I – Flood Risk Memo

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- Consult the NSW SES for detailed advice.
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Disclaimer

Noted.

N/A

CPHR notes that there is a disclaimer on page 119 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."

Recommendation

- The consent authority to consider the impact of assessing the proposed development with such a disclaimer.
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3.2 Response to Organisations and Public Submissions

Table 3 Response to issues raised by Organisations and Public Submissions

Theme	Response	Supporting Documentation
Matters specifically relating to the Northern Precinct		
Affordable Housing should be provided in perpetuity		
Affordable housing should be provided in perpetuity, preferably with rent set as percentage of income affordable housing rather than discount off market affordable housing.	The proposal will provide affordable housing as defined by the <i>State Environmental Planning Policy (Housing) 2021</i>. The proposal includes a minimum 5% of the gross residential floor area as affordable housing for management by a registered Community Housing Provider (CHP). The registered CHP will manage rent-setting, tenant eligibility and housing allocation.	Appendix H – Community Housing Provider Letter
Impact on amenity		
Overshadowing and wind: require seasonal solar access modelling and detailed pedestrian-level wind assessment for Cope Street Plaza, Raglan Walk, and Botany Road frontages.	Solar access and overshadowing analysis was undertaken as part of the SSDA which confirms that high levels of amenity are anticipated in public domain spaces. The SSDA was also supported by detailed pedestrian-level wind assessments. s. Pedestrian-level wind conditions for Cope Street Plaza, Raglan Walk and the Botany Road frontages have been assessed through wind tunnel testing. The results confirm that, with the proposed built form and integrated design measures, suitable wind comfort conditions are achieved for their intended use. No additional assessment is required.	Appendix F – Wind Engineering Model
Apply design changes (setbacks, podium articulation, tower shaping) where needed to protect amenity beyond minimum	The proposal results in high levels of amenity, with compliant overshadowing, solar access, natural ventilation and visual privacy outcomes. Built-form design measures, including setbacks, podium	Appendix F – Wind Engineering Mode

compliance. Modelling should be validated post approval.	articulation and tower shaping, have been informed by detailed technical assessment and iterative design testing, and are not limited to minimum compliance. These measures have been refined through an integrated design process to protect both on-site and surrounding amenity.	
Acoustic/vibration: adopt EPA-aligned rail vibration and ground-borne noise limits and mitigation design should be adopted to protect residential amenity and podium uses. Modelling should be validated post approval.	The EIS was supported by a Noise and Vibration Impact Assessment, prepared by Stantec, which assesses the construction and operational noise impacts associated with the proposal. The NVIA adopts the criteria set by the NSW Environmental Protection Authority. The NVIA concluded that, subject to the recommended mitigation measures, operational noise and vibration impacts will comply with the EPA and SEPP standards and not unreasonably affect nearby receivers or future occupants.	Not applicable.
Construction staging and interface with the operating station		
The application should prepare robust Construction Environmental Management Plans (CEMPs), OOHW controls, transparent community notifications, and a Community Oversight Panel linking WMQ works to station operations.	Detailed CEMPs and community consultation strategies will be developed post approval to manage construction impacts, including to the interface with the Waterloo Metro Station. Significant consultation will occur with Sydney Metro to ensure impacts do not impact operations.	Not applicable.
Quality of design		
The proposal should demonstrate design excellence.	The proposal exhibits design excellence. An updated Design Excellence Strategy has been prepared by Urbis to establish the framework to deliver design excellence for the Northern Precinct and was provided with the EIS. The proposal was reviewed by the State Design Review Panel (SDRP) on four occasions who expressed support for a number of key elements of the northern precinct design.	Not applicable.
Loss of commercial floor space		

Removal of commercial office replacing with student housing is not supported.	The proposal includes three levels of commercial office floorspace. No student housing is proposed in the northern precinct.	Not applicable.
Traffic Impact		
The proposed additional residential and co-living development will attract additional traffic.	The Environmental Impact Statement (EIS) was supported by a Traffic Impact Assessment prepared by ptc. The TIA included traffic modelling which confirmed that the traffic generation from the northern precinct development is relatively minor in comparison to existing volumes and that the proposal will not have a detrimental effect on the operation of the surrounding road network.	Not applicable.
Built form		
- Increase height to provide more public / key worker housing - Increase in the number of storeys to provide more public housing and key workers housing.	The height of the proposal has been carefully considered to balance the ability to deliver housing on the site with impacts to surrounding public domain and residences including overshadowing, visual impacts, traffic etc. The proposed heights and unit mix strikes this balance most appropriately.	Not applicable.
Matters relating to the overall WMQ development		
Reduction of community facilities floorspace		
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.	The proposed community facility is located in the central precinct of the Waterloo Metro Quarter. Refer to the Central Precinct RTS report for a response.	Not applicable
Inadequate SIA assessment		

The SIA does not address the loss of community facility floor space.	The Social Impact Assessment (SIA) for the Northern Precinct addresses the detailed design, construction and operation of a mixed-use development comprising two residential towers above a commercial and retail podium within the Northern Precinct of the WMQ site. The application leverages the change in land use from a commercial tower to residential, as enabled by the Second Amending SSDA lodged concurrently, to respond to housing affordability pressures in Sydney's inner-city suburbs. The maximum permitted GFA will remain unchanged, with floorspace redistributed between the revised Central and Northern Precinct envelopes. The assessment focuses on the social impacts arising from the change in land use, rather than the redistribution of non-residential floorspace. Matters relating to the redistribution of community facility floorspace between the Second Amending SSDA and the Central Precinct are addressed separately in the response to submissions.	Not applicable.
The EIS and Social Impact Assessment (SIA) rely on precinct-level averages that mask concentrated disadvantage among social housing tenants immediately adjacent to WMQ.	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. The social locality defined for the SIA reflects the size and scale of the project and the breadth of its potential social impacts across the whole community, as well as specific communities/ cohorts. Given the project's capacity to influence 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. 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	Not applicable.

	accurate and balanced representation of the broader community likely to interact with, and be affected by, the proposal. 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. 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. 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.	
Concerns relating to inadequate SIA assessment and flawed methodology, specifically on loss of community facility, the appropriateness of a childcare centre and impact on neighbour public housing estate.	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. The assessment considered social impacts at both the site and broader locality level, including the needs and constraints of communities beyond the immediate Waterloo area. This broader approach was adopted to ensure that potential cumulative impacts and service catchments were appropriately understood.	Not applicable.

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. Limited availability of affordable, non-commercial spaces for vulnerable communities, together with space constraints, further limits service provision. Strategic planning and targeted investment are therefore required to address these needs.

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.

▪ To ensure social equity, the application should: – Prepare and adopt a Waterloo-wide Social Infrastructure and Governance Plan. – Set measurable social outcome KPIs.	It is considered that a Waterloo-wide Social Infrastructure and Governance Plan and set measurable social outcome KPIs are outside the scope of this Social Impact Assessment (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. It is recommended that matters relating to social equity are 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. The SIA assessment includes recommendations for council and other state and non-profit social infrastructure, and services providers continue to monitor supply and demand for social infrastructure and services associated with population growth attributed to this and other similar developments in Waterloo, to ensure adequate provision to meet demand. The inclusion of KPIs would be addressed within a SIMP and post approval as per Ministerial conditions of Approval, where indicators can be clearly defined, monitored and reviewed over the life of the project, rather than within the impact assessment itself. 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 to be considered through subsequent management and implementation framework.	Not applicable.
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Overshadowing of public open space

- Minimise the impact of the development on future Waterloo Park, especially in the afternoon. - The submission acknowledges marginal improvements in overshadowing by the development on the proposed park.	An Overshadowing Report was prepared by RWDI and accompanied the EIS and considered potential future overshadowing impacts to the future Waterloo Park. The Overshadowing Report found that the entire Waterloo Park will receive at least two hours of direct sunlight between 9am and 3pm in mid-winter. The proposal performs slightly better than the approved scheme, with less overshadowing after 3pm.	Not applicable.
Management of public domain areas		
How public accessible 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.	The publicly accessible space will be managed by the Building Management Committee who will appoint a Shared Facilities Manager.	Not applicable.
Protect public domain character: CPTED, public realm management (no privatisation), and signage controls.	The proposal seeks to protect and enhance public domain character within the Waterloo Metro Quarter precinct. The proposal will deliver 2,248 sqm of new publicly accessible spaces across the WMQ site. Within the northern precinct, the principal public domain spaces are Raglan Plaza and Raglan Walk which provide generous circulation areas designed to accommodate the high foot traffic generated by the northern Metro Station entrance. Crime Prevention Through Environmental Design (CPTED) measures have informed the design of public domain spaces. Operational management would be subject to conditions of consent. The proposal does not seek consent for signage.	Not applicable.
Public consultation / engagement		
Running four concurrent exhibitions at one site across a holiday window is neither accessible nor democratic	The exhibition of the proposals was undertaken in accordance with the statutory requirements of the EP&A Act and relevant Departmental Guidelines. Due to the exhibition period coinciding with the holiday	Not applicable.

for predominantly public-housing communities.	window, the proposals were subject to an extended exhibition period of 50 days.	
- There is a lack of integration between WMQ and Waterloo South planning, which risks fragmented outcomes. - Existing co-governance bodies (e.g., Waterloo Human Services Collaborative) and the developer's panel were not engaged meaningfully.	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. Notwithstanding, the Applicant is committed to communications with the relevant parties to assist where possible.	N/A
Parking management		
- Zero parking for ~500 co-living rooms and ground-floor retail may exacerbate local parking stress. - Bicycle parking numbers must be paired with safety, theft-prevention, and end-of-trip facilities. - Servicing and childcare drop-off must be actively managed.	Concerns regarding parking related to the co-living rooms have been addressed as part of the Central Precinct RTS Report and Basement Modification RTS Report. Bicycle parking for the proposal will be provided in the site-wide basement which is subject to SSD-10438. The proposed bicycle parking will be paired with safety and end of trip facilities. 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.	Not applicable.
Connecting with Country		
Commit to Connecting with Country through governance and programming, not only landscape gestures.	The proposal recognises the importance of Connecting with Country. The approach to Connecting with Country will continue to be considered as the design and operational aspects of the development are further refined.	Not applicable.
Recommended measures to be adopted during construction and demolition		

▪ To incorporate the following mitigation measures during demolition and construction: – 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. – 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	The EIS included mitigation measures at Appendix JJ. Conditions of consent will also be implemented by the Department in their determination of the Application.	Not applicable.
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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.
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4 Updated Project Justification

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

- **Project design:** The proposed design refinements in this RTS report are minor in nature and do not have material impacts on the overall building design. The proposed development responds to and is fully consistent with the second amending concept DA submitted concurrently with the Northern Precinct SSDA. The northern precinct 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 the 314 new residential dwellings, including affordable housing, address Sydney's urgent housing needs.
- **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 314 residential units, including 39 affordable housing dwellings, in a highly accessible location adjacent to the 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:** The development remains consistent with the statutory planning framework as set out in the EIS.
- **Community Views:** Community views received during the public exhibition have been considered as detailed within this report.
- **Environmental Impacts:** 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.
- **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 housing, including affordable 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.

On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

Disclaimer

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All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Submissions Register

Appendix B Supplementary Design Report

Appendix C Updated Architectural Drawings

Appendix D Civil Engineering Memo

Appendix E Traffic Engineering Memo

Appendix F Wind Engineering Memo

Appendix G Supplementary Landscape Design Response

Appendix H Community Housing Provider Letter

Appendix I Flood Risk Memo and Flood Emergency Response Plan

Appendix J Fire Engineering Letter

Appendix K Updated Clause 4.6

Appendix L Revised Statutory Compliance Table

Appendix M Mitigation Measures

Appendix N Connecting with Country Guidelines



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and communities
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