

Thursday 27 August 2026

Jude Urbanik

Department of Planning, Housing and Infrastructure

Email. Jude.urbanik@dpie.nsw.gov.au

Dear Jude

Re: Waterloo Estate (South) – Social Impact Assessment (SIA) and Preliminary Social Impact Management Plan (SIMP) Response to Submissions

This letter relates to the State Significant Development Application (SSDA) and concurrent rezoning to the Sydney Local Environmental Plan 2012 for the Waterloo Estate (South) Concept (SSD93222706).

The Department of Planning, Housing and Infrastructure (the Department) has in its assessment of the SSDA identified matters to address with respect to responding to agency submissions. In their submissions, a number of submitters included matters relating to the Social Impact Assessment and Preliminary Social Impact Management Plan (SIMP) that accompanied the SSDA. The SIA and SIMP will be revised to address comments received. Additional engagement and analysis will be undertaken for this revision.

As part of preparing our Response to Submissions we have met with:

- The City of Sydney staff who prepared the City's submission (meeting held on 23 July). From that meeting we have been able to achieve broad agreement with the City on the required revisions to the SIA and the associated SIMP
- The Homes NSW Relocation Team as a number of submissions reference the relocations process and some of its social impact implications (meeting held on 22 July). A key focus of this discussion was on understanding the approach to relocation and that Homes NSW will continue to be adaptive and flexible in the relocations process to ensure it is appropriate to each phase of the project.
- Teams within Stockland, who have deep understanding of some of the longstanding issues raised in submissions, and of the latest initiatives being developed by Stockland which are relevant to feedback raised in submissions.

In revising the Social Impact Assessment (SIA) and Social Impact Management Plan (SIMP), we will also:

- Meet with the Sydney Local Health District as a number of the submissions comment on the Health One facility no longer being part of the proposal and express interest in alternatives to support access to affordable health services

- Convene a meeting with REDWatch, Counterpoint and other local stakeholders to discuss how the SIA can best respond to some of the comments raised
- Meet with the Community Housing Providers involved in the project to understand more about the allocations process in order to develop a clearer picture of the future social housing resident profile. This will be critical in understanding future community infrastructure and human service demand and how existing service provision may need to be recalibrated to address the needs of a different social housing demographic
- Continue to work with City of Sydney staff so that we develop a mutual and collaborative understanding of the SIA including its key opportunities and its parameters or constraints.

The SIA and SIMP will be updated following review of the submissions and consultation with stakeholders and submitted to DPHI within 1 month of this letter (mid September 2026).

Based on the meetings undertaken and our review of all comments, this letter provides a response to matters raised by the following submitters for the Department's consideration:

- DPHI – Item 8 ‘Social impacts’
- City of Sydney – Item 4 ‘Social and Affordable Housing and Social Impacts’ (specifically points under ‘Social Impacts’)
- REDWatch – ‘Social Impact Assessment (SIA) and Social Impact Management Plan (SIMP)’, ‘People and Place as a key interfacing document’ and ‘SIMP Action Review and Recommendations’
- Selection of community submissions
 - Counterpoint Community Services – Items ‘Acknowledgement of Social Impacts’, ‘Cumulative and Long-Term Impacts’ and ‘Social Impact Assessment — Acknowledgement Without Protection’
 - Policy Watchdog Australia – Items ‘4.2 Binding Right-of-Return Commitments Are Absent at Concept Stage’ and ‘The Social Impact Assessment Systematically Converts High Negative Impacts to High Positives Through Unspecified Future Mitigation’
 - Councillor Ellsmore – Items 5 ‘Stronger and more specific actions included in the Social Impact Assessment’ and 6 ‘Requirements that the social, health and wellbeing impacts of the project are documented and reported’
 - Redfern Legal Centre – Items 3 ‘Differing views in the community on Waterloo Renewal’, 7 ‘Community facilities’ and 9 ‘Support and social infrastructure in place during construction phase’
 - Shelter NSW – Item c(ii) ‘Community facilities and retail’

This letter in our opinion has responded to the matters raised by the above in their submissions and enables the Department to finalise its assessment of the proposal with respect to the SIA and SIMP considerations.

An overview of the **Revised SIA Report structure** is attached.

Kind regards,

A handwritten signature in black ink, appearing to read "S. Rossiter". The signature is written in a cursive, flowing style.

Steve Rossiter, Director, L10 Collective

Submission from DPHI (6 July 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
D1	Given the proposal seeks approval at a precinct scale, it is critical that the Social Impact Assessment (SIA) and Preliminary Social Impact Management Plan (SIMP) clearly establish a robust, overarching framework for managing social impacts. This is particularly important as future stages are likely to assess more isolated and site-specific impacts.	It is noted that the SIA and SIMP should establish a robust, overarching framework for managing social impacts at the Concept Masterplan stage and future stages of development.	SIA to be updated (throughout) Revised SIMP (throughout)	See also the City of Sydney and Counterpoint submissions
D2	a) While the SIA identifies a diverse existing social baseline within the existing community including a number of groups at increased risk of social and psychological impacts, the assessment and proposed mitigation measures are largely framed at a broad, whole-of-community level. The Department considers a more targeted and cohort-specific approach is required, including clearly explaining how different groups may experience impacts and the development of tailored mitigation measures.	The SIA identifies a diverse existing social baseline within the existing community including vulnerable community members. Further consideration of how different groups may experience impacts will be provided in the revised SIA. Tailored mitigation measures to	SIA to be revised SIA (section 7 – Social Impact Assessment and section 8 Concluding comments: social impact mitigation, enhancement and management) SIMP to be updated SIMP (Table 2)	See also REDWatch submission

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		support these groups will be provided in the revised SIMP.		
D3	b) The Department also notes inconsistencies in the assessment of impact in the SIA and SIMP, particularly for pre-construction impacts such as tenant relocation, and it is not clear how impacts will be managed across the full lifecycle of the development (Sections 7.2.1, 7.2.2, 7.2.4.1, 7.2.5.4, and 7.2.8.3). It is critical that the duration of impacts is accurately reflected throughout the SIA. Please revise the SIA and SIMP accordingly.	A consistent approach to impact assessment will be used in the revised SIA and SIMP. The documents will consider the duration of impacts and management of impacts across the full lifecycle of development as much as possible.	SIA to be updated (section 7 Social Impact Assessment – particularly sections 7.2.1, 7.2.2, 7.2.4.1, 7.2.5.4 and 7.2.8.3) SIMP (Table 2) to be updated	See also the City of Sydney submission
D4	c) The SIMP does not clearly identify desired community outcomes, monitoring and reporting frameworks, performance measures, or how cumulative impacts will be managed. The SIMP should be revised to address these matters and be consistent with the Department’s Social Impact Management Toolbox for State Significant Projects.	The SIMP will be revised to clearly identify desired community outcomes, monitoring and reporting frameworks, performance measures and how cumulative impacts will be managed, as part of a robust approach. It will ensure consistency with the Department’s Social	SIMP (Table 2) to be updated	See also the City of Sydney and REDWatch submissions

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		Impact Management Toolbox for State Significant Projects.		
D5	d) The Department advises the Applicant to carefully consider the City of Sydney's (the City) key social impact matters and appropriately address the matters raised.	The SIA and SIMP will be revised with consideration of the social impact matters raised in the City of Sydney submission.	SIA to be updated (throughout) SIMP to be updated (throughout)	See the City of Sydney submission

Submission from City of Sydney (2 June 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1.	The SIA is required to assess likely social impacts against baseline conditions (DPHI SIA Guidelines 2026, pg.26). The baseline conditions on which unmitigated impacts are assessed vary throughout, from using the current built form in Waterloo South as the baseline to using the proposed concept plan as the baseline. In other impacts, it is unclear what the baseline condition is. It is therefore unclear how the magnitude of social impact has been determined, resulting in some impacts appearing more positively mitigated than what would be expected.	This issue has been discussed with the City of Sydney. Requirements for use of baseline have been generally agreed. This will also require confirmation with Homes NSW	Pre-development conditions will be used for social impacts related to physical form, urban design etc. 2022 Rezoning and Design Guide may be used for changes from 2022 to 2026 Concept SSDA. Use community profile prior to any development and/or relocation as baseline for social/community issues – change in community character, change in demand for services, etc.	
2.	The SIA does not consistently evaluate, draw attention to and prioritise the social impacts that are important to	The SIA will be enhanced to draw more direct links	The removal of the Health One facility	

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	people, as informed through engagement (DPHI SIA Guidelines 2026, pg.22). The SIA does not consider the potential social impact resulting from the proposed removal of the Health One facility, despite retaining health services identified as a key community priority in engagement feedback and several impacts which assess access to social infrastructure and health and wellbeing (impacts 7.2.3.3, 7.2.5.2, 7.2.5.5 and 7.2.7.3).	between social impacts and consultation outcomes	from the project will be more clearly documented. This will also include input from the Local Health District regarding rationale for decision and potential alternative approaches.	
3.	Several impacts also assess substantially the same change and overrepresent the reported positive impacts. This includes the following groups of impacts: 7.2.2.2, 7.2.5.2 and 7.2.7.3; 7.2.1.1 and 7.2.1.2; and 7.2.3.3 and 7.2.5.5.	The SIA report will be revised to reduce duplication and restatement	A restructuring of the SIA report will take place. The proposed revised structure has been discussed with the City of Sydney	Will address assessment of impacts: 7.2.2.2, 7.2.5.2 and 7.2.7.3; 7.2.1.1 and 7.2.1.2; and 7.2.3.3 and 7.2.5.5. Also raised in REDWatch submission
4.	The SIA identifies some impacted groups as 'existing residents in Waterloo South Estate and surrounding areas'. It does not consider how relocated Waterloo South residents, residents in Waterloo Central and Waterloo North, and residents in private lots in Waterloo South will	The experiences of relocated residents has been discussed with the Homes NSW Relocations Team. A key focus of this discussion was on understanding the	The experience of relocated residents will be incorporated into a revised SIA including different impacts over time and the requirement	Specifically need to address this issue in relation to 7.2.2.1 and 7.2.5.3

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	experience different impacts over time and require different management measures	approach to relocation and that Homes NSW will continue to be adaptive and flexible in the relocations process to ensure it is appropriate to each phase of the project.	for different management measures at different stages of the relocation process.	
5.	The SIA largely does not include mitigation and enhancement measures which are tangible, relevant, deliverable and enduring (DPHI SIA Guidelines 2026, pg.25). Some impacts include vague details on project commitments, outcomes and strategies as mitigation measures which then lack tangibility (i.e. impacts 7.2.5.2 and 7.2.7.1), some do not address the key impact at hand (i.e. impacts 7.2.8.1, 7.2.8.2 and 7.8.2.3) and others don't outline who is responsible for implementation and the relevance of this measure in altering the impact from a negative to a positive impact (i.e. impact 7.2.5.3).	The SIMP will be revised to follow the structure identified in the Social Impact Management Toolbox for State Significant Projects (February 2023).	Revision of SIMP to include: • Category of impact • Social impact / opportunity • Project lifecycle / stage • Who will be affected • Mitigation or enhancement • Desired community outcome • Responsibility • Measuring effectiveness	While these key issues mitigation measures, indicators, etc will be incorporated into the body of the SIA, they will be most clearly articulated in the SIMP. Issue also raised in DPHI and REDWatch submissions

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			(indicators and targets) • Method (data and source) • Monitoring and reporting frequency • Adaptive measure (if target not met) Cumulative impact	
6.	Apply a consistent baseline across all impacts and reassess the unmitigated and mitigated assessment	Agreed on baseline – to be discussed with City of Sydney Unmitigated and mitigated assessment to be reviewed and enhanced	Pre-development conditions will be used for social impact related to physical form, urban design etc. Use community profile prior to any development and/or relocation as baseline for social/community issues.	Baseline also raised by DPHI and consideration of key groups within community

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			Clarify what the mitigation strategy is to reduce the significance of the initial rating of an impact. A reduction in significance must be clearly linked to a mitigation strategy	
7.	Include the approved 2022 planning controls and Design Guide as part of the baseline to accurately assess the baseline change from the proposal	Noted will review and include relevant components	Agree on use of approved concept plan for social impact related to physical form, urban design etc. for changes from 2022 controls to 2026 Concept SSDA but pre-development conditions are considered to be the key baseline to measure change. Use community profile prior to any development and/or	

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			relocation as baseline for social/community issues.	
8	Provide an assessment of access to health infrastructure and services, considering the removal of the health one facility. This should be supported by a community facilities and service needs analysis, per the Waterloo Estate (South) Design Guide Provision 6.1.1 (1) and 6.1.1 (2), or state why this is not applicable.	A Community Facilities and Service Needs Analysis will not be conducted as part of the SIA.	Stockland has completed a Social Infrastructure Assessment which can be enhanced to provide some guidance. Consultation will be held with Sydney Local Health District LHD and others regarding provision of health services as alternative to Health One.	Discussions with Stockland will be undertaken to understand latest planning and potential partnerships for health service provision
9	Provide an assessment of access to social infrastructure (including education), considering the proposed population density on site and the capacity of infrastructure to accommodate	Will undertake high level assessment. Decisions about school infrastructure ultimately determined by Schools Infrastructure NSW	Will consult with SINSW / Education to confirm plans	

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10	Provide an assessment of access to affordable services like health facilities and lower price point service offerings		Stockland has completed a Social Infrastructure Assessment which can be enhanced to provide some guidance. Consultation will be held with LHD and others regarding provision of health services as alternative to Health One.	Discussions with Stockland will be undertaken to understand latest planning and potential partnerships for health service provision
11	Provide an assessment of provision of inclusive access for all those who live in the estate, and for Aboriginal and social tenants generally, particularly regarding the risks and strategies to manage social conflicts between residents and security training	Social cohesion will be addressed specifically as part of updated SIA	Engagement with REDWatch, Counterpoint and local indigenous organisations will be undertaken to ensure this issue is addressed appropriately	
12	Provide an assessment of managing uses of public spaces including the new parks and any potential	It is noted that the parks will be handed over to the		

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	conflicts with existing community using public spaces and nearby social housing tenants	City of Sydney. They will be responsible for park design so these considerations will be considered by the City in that process.		
13	Provide an assessment of impacts on social and mental health impacts of relocated social housing residents during all stages of relocation and return	Consultation has been undertaken with Homes NSW Relocations Team to inform the response to submissions and refinement of SIA.	Homes NSW is currently undertaking a survey of relocated residents regarding their experience with the relocation process. If the data is available, it will be incorporated into the SIA.	
14	All mitigation measures need to be reviewed and updated to ensure they are tangible, relevant, deliverable and enduring. Where mitigation and management measures are not defined or secured, the impact rating should be updated.	The SIMP will be revised to follow the structure identified in the Social Impact Management Toolbox for State Significant Projects (February 2023).	SIA and SIMP to be restructured.	Impacts 7.2.5.2 and 7.2.2.1: clearly define project commitments, outcomes and strategies as mitigation measures

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				- Impact 7.2.7.1: explain how the mitigated assessment can increase to high positive when the SIA states there are no existing enhancement measures or details on proposed targets - Impact 7.2.5.3: justify how residents in Waterloo South and surrounding areas (including Waterloo North, Waterloo Central and private lots) will experience a mitigated positive impact during construction and how proposed measures fully mitigate and enhance impacts

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				- Impact 7.2.5.5: outline the proposed mitigation measures around how, when and where services will be accommodated on site during redevelopment. Appendix C – Mitigation Measures states the SIA notes temporary spaces are to be provided during construction, but no spaces are provided/referenced in the SIA. - Impacts under 7.2.1: provide tangible mitigation measures on delivering dwelling diversity, including larger apartment sizes, and securing

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				affordable housing in perpetuity. Provide details on the proposed skills exchange and redeployment centre as a mitigation measure, including GFA inclusion, concept plan staging and likely responsible entity for implementation Also raised by REDWatch
15.	Impact 7.2.3.1: relevance of impact given Waterloo Metro station is not part of the proposal	Will review. Although Waterloo Station not within site boundaries its presence immediately adjacent to site is relevant.	As it also plays a role in relocation, it is appropriate to consider Waterloo Metro in the SIA	
16.	Impact 7.2.5.2: how schools will have “improved access and stronger connection to Waterloo South through integrated site design”, noting the schools	Will review statements	Will revise statements accordingly	

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	listed (including Alexandria Park Community School) are located several blocks away and the demand to capacity is unknown			
17.	Impact 7.2.1.2: consider how the extent and duration of this impact will change over time, noting relocations may place supply pressure on the local social housing network	Will consider	Will revise SIA accordingly	
18.	The intended uses for non-council community spaces. The SIA notes this is not confirmed, while the EIS notes the reference schemes locates a new school fronting George Street (pg.118).	Will check and resolve differences	Have received updated information from Stockland on some of the possible uses. Some are currently subject to ongoing discussion and negotiation but where possible updated information will be included	
19.	The development will ensure long-term affordable retail and service options are provided within the precinct. The SIA notes a retail strategy will be developed as part of project planning however, it is imperative that the parameters of this strategy include the consideration of a minimum percentage of retail floor space to provide goods and services	Will confirm details of retail strategy	Will discuss Retail Strategy with Stockland and provide as much detail as appropriate in SIA given stage of	

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	for lower-income households. Clarification is also sought how this strategy will be implemented and complied with in the long-term		development Retail Strategy is in.	
20.	Whether there has been any consideration of including a commitment to prioritising commercial floor space for Aboriginal businesses. As above in the retail strategy, clarification should be provided on how Aboriginal businesses may be prioritised and managed in the long-term.	Will confirm	Will revise SIA accordingly	
SIMP				
21.	Similarly, the SIMP is insufficient and does not align with DPHI guidance under the SIA Guidelines (2026) and the Social Impact Management Toolbox for State Significant Projects (2023).	The SIMP will be revised to align with the Social Impact Management Toolbox for State Significant Projects (2023)	Revision and restructure of SIMP	
22.	In addition to the above, while the inclusion of a CPTED assessment in the application is commended, there are some gaps in the assessment that require addressing.	A full CPTED assessment is not a requirement of the SIA Guideline. However, comments are being reviewed and appropriate revisions will be incorporated into updated SIA.	The CPTED Assessment was undertaken by Urbis. Urbis has reviewed the city comments and is responding. Updated information from Urbis will be	The City's comments also note: A CPTED assessment specific to the impacts of construction. If not fully incorporated into the concept report, a

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			incorporated into the SIA.	detailed CPTED assessment must be provided at each stage of detailed design and construction given past safety concerns on Cope and Raglan Street during the Waterloo Metro Quarter redevelopment. This may be an avenue to address CPTED issues

Submission from REDWatch (2 June 2026)

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R1	Social Impact Social Impact Assessment (SIA) and Social Impact Management Plan (SIMP) For REDWatch the success of this project is not just in the built environment, but importantly how it handles the social impacts of the redevelopment on a vulnerable community. The development needs to manage the complex social impacts associated with the redevelopment of an existing public housing estate where there is a mixture of aging in place working class public housing tenants and more recent tenants allocated on a most-disadvantaged-get-priority-basis.	The SIA will be revised to more fully consider the social impacts of the redevelopment on a vulnerable community – Including long term and high needs public housing tenants.	Revise SIA (throughout) Revise SIMP (throughout)	See also the DPHI submission
R2	REDWatch is a member of the Waterloo Human Services Collaborative (www.waterloo2017.com), which brings together government and non-government agencies around an action plan to improve support services for Waterloo public housing tenants. As part of the Groundswell grouping of peak and local NGOs, REDWatch also participates in regular Groundswell / Homes NSW District meetings as well as Groundswell / Sydney Local Health District meetings. A large amount of our time goes into human service related issues,	The SIA documents the demographics of the Waterloo public housing estate community and locality and some of the key challenges facing the community. The SIA and SIMP will be revised to more fully reflect the important role of human services to support positive outcomes.	Revise SIMP (throughout)	See also the DPHI submission

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	REDWatch has reviewed the SIA and are pleased with the level of analysis in the report. The narrative of the report captures the demographics of the Waterloo public housing estate and surround area as well as capturing some of the challenges facing a successful redevelopment. This is in contrast to a recent SIA for the adjoining Waterloo Metro Over Station Development, where the adjoining disadvantaged community was not recognised nor investigated for mitigation measures. For REDWatch the key questions about the SIA and Preliminary SIMP are: • have all the possible impacts (positive and negative) been identified; • do the recommendations adequately address the problems identified and improve the situation, are there any recommendations needed but are missing and; • what needs to happen to make sure that these recommendations are implemented so that positive improvements actually result? REDWatch is of the view that more work is required on the SIMP to adequately reflect all the issues and mitigations needed.	More specifically the SIMP will be revised to: • Identify a broader range of likely positive and negative impacts • Provide recommendations designed to adequately address issues and deliver improvements • Outline measures and mechanisms to support implementation of the recommendations, and to deliver improvements		

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R3	REDWatch recommends that the Department should condition the Concept DA such that it requires: - the Preliminary SIMP be refined in the light of exhibition feedback. - that at each DA Stage the project is required to report against progress on implementing the SIMP and - that at each DA Stage the project proposes any alterations or refinements necessary to the SIMP that are need to manage identified social impacts arising from the project to that date.	The SIMP will be refined to reflect exhibition feedback received from submitters. It is for the Department to consider the submitter's recommendation that the Concept DA is conditioned to require further aspects of this submitter's request. The SIMP will be revised to incorporate an approach to ongoing impact measurement and reporting of implementation of the initiatives identified in the SIMP, and any necessary alterations or refinements to the SIMP itself to manage project impacts	Revise SIMP (throughout) Potential for the Department to condition the Concept DA	NA
R4	The SIA uses the SIA Guidelines Social Impact Category definitions to structure the report. While this is a good framework for identifying impacts that might be missed, it also leads to some repetition of	The SIA will use the SIA Guidelines Social Impact Category definitions. However, it will be	Revise SIA (throughout)	See also the City of Sydney submission

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	related issues across the categories where it may be more useful to deal with issues grouped differently.	prepared to avoid repetition / duplication, and where possible, will provide a clearer narrative and alternative approach to discussion of issues / impacts across categories		
R5	As the key aim of the SIMP is to manage social impacts we would like to see both the initial impact without mitigation and the expected mitigated impact clearly stated in the SIMP. In our comments on the individual recommendations in the SIMP we have also included a “Social Significance Matrix level change as an indicator of Importance of proposed mitigation” score. This score is the number of steps in the social significance matrix between the unmitigated and mitigated level. The higher this score the more important it is for the mitigations to change the base line impact. If the mitigations do not work then the baseline is the likely outcome. For example, for Impact 7.2.2.1 which is “Changing social mix and impact on existing communities” the SIA recognises this issue as a “High Negative”. The	The SIMP will be revised to include discussion of impacts without mitigations / and impacts with mitigations. The proposed Social Significance Matrix and scores will be considered (and included in the SIA document). Further consideration will be given to the submitter’s desire for the focus of the SIMP to be on the areas that are in high need of mitigation, and for the	Revise SIMP (throughout)	See also the City of Sydney submission

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	management plan proposes a number of measures it expects to move the outcome to become a “High Positive”. This is six (6) level changes on the Social Significance Matrix. This indicates both the high need for mitigation and the importance of successful mitigation for the project to succeed. For REDWatch the focus needs to be on the areas that are in high need of mitigation and if the mitigations proposed can deliver the improvements required. The focus then, in our view going forward in the project, is not if the initial suggested mitigations have been done but have they worked to mitigate the social impact or does more need to be done. For this reason, REDWatch would like to see both the unmitigated level and the mitigated level in the SIMP and not just the mitigated level. The SIMP needs to be an active plan with reporting and update requirements required by the Concept consent and hence we request the Department to include this condition.	inclusion of effective mitigations that deliver the required improvements. The SIMP will include an ongoing approach to monitoring and reporting to support impact measurement and the achievement of meaningful project outcomes.		
R7	People and Place as a key interfacing document The SIMP makes many references to the Waterloo People and Place Plan (Homes NSW) as a key interfacing document. On page 30 of the EIS it	We understand the People and Place Plan is an advisory document, rather	Revise SIA and SIMP as appropriate based on review and	See also the City of Sydney submission

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	describes this plan as “not a policy or contractual document”. The document was designed to “a high level outline of key recommendations to help deliver positive outcomes for Waterloo people and places”. The earlier version of the plan was about ‘actions’ and in the current version actions were downgraded to ‘recommendations’. There has been much criticism of the final plan by local organisations and services. The Waterloo Human Services Collaborative, made up of government and non-government agencies working on human service supports for tenants expected it to dovetail with its action plan, but it currently sits as an advisory document rather than a plan that can be implemented or integrated. REDWatch welcomes elements of the Waterloo People and Place Plan being absorbed into the SIMP where it should lead to actual action rather than just recommendations. Missing however, are elements of concern to NGOs and service agencies dealing with the on the ground issues facing existing tenants that may be improved or made worse by the redevelopment and the SIMP. REDWatch recommends that the revision of the Preliminary SIMP investigates concerns raised by	than including actions for implementation. The revised SIMP will consider the People and Place Plan and potential opportunities to address key issues through relevant actions. It is understood that a key area of concern is on the ground issues facing existing tenants that could be improved or made worse by the redevelopment and SIMP. In addition the revised SIA and SIMP will consider issues raised by the Waterloo Human Services Collaborative and members regarded as not adequately covered in the	consideration of issues raised	

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	the Waterloo Human Service Collaborative and its members about areas not adequately covered currently in the Waterloo People and Place Plan and the Preliminary SIMP. One of the main concerns with the Waterloo People and Place Plan was that it was just a document about Waterloo South, it was not a full Waterloo Social Housing Plan, hence it left out many of the key inter-dependencies between Waterloo South and the rest of the Waterloo public housing communities. As a result it did not deal with two different social housing models working alongside one another or with how they will interact. People and Place Plan also glossed over the existing human service issues facing tenants because in the redevelopment model, CHPs are expected to solve all those problems with the extra money CHPs get for Commonwealth Rent Assistance that Homes NSW can not get. Tenants have reservations about going to their landlord for issues that they fear may also impact their tenancies such as drug and alcohol issues, but even if the CHP becomes a human service referral body, then they are still referring people into the wider human service eco-system, which is often unable to offer timely	People and Place Plan and SIMP. More specifically, the revised SIA and SIMP will consider Waterloo South in the context of the broader Waterloo area including interactions between two models of social housing (and engagement with Homes NSW / CHPs). The revised SIA and SIMP will consider the importance of supporting community cohesion throughout the redevelopment (including post delivery); this will include strategies to support successful tenancies for tenants with complex issues, while	Recognises as a key issue. This in part relates to the allocations process and management of tenants by CHPs. The revised SIA will explore options for enhanced service delivery and support.	

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	support. These are the kind of issues the Waterloo Human Services Collaborative is working on, but they were outside the scope of People and Place but will be key factors in how well the proposed model works. There are similar blind spots in People and Place around what is necessary to turn tenure mix into social mix, and how to rebuild community cohesion after the redevelopment. As density has been taken as a given, and there is a belief that the redevelopment must be a good thing, there has been no consideration about how tenants with complex issues will fit within such a neighbourhood and how that might impact those around them. High density has been shown to work overseas with a lot of curations but these have not included 30% of the community being allocated on the basis of complexity of need. You can make the building tenure-blind, but if one building has a high level of people with mental health and drug and alcohol issues who are not getting very good support, then everyone will know which are the social housing buildings. There is an expectation that private owners in the development will be much more inclined to ring the police around such events than	their neighbours are able to experience quiet enjoyment of their homes.		

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	those in social housing who have to deal with these behaviours within their building. Strategies to help complex tenants have successful tenancies, while allowing their neighbours to have quite enjoyment of the property next door will be essential to making the project succeed. As Homes NSW (the proponent with Stockland) is a key responsible party in implementing the SIMP it is also recommended that it translates its Waterloo People and Place recommendations and the SIMP recommendations into actions, which have the authority of the agency and its Minister. This is especially important as Homes NSW is a large compartmentalised agency, which has many different components that interact with Waterloo tenants and may be part of the SIMP implementation. Both Waterloo People and Place and the SIMP have similar responsible partners on many items these are Stockland, Homes NSW, CHP providers and City of Sydney. It is essential if the SIMP is to work that these organisations have clear agreements about what their responsibilities are for the delivery of the SIMP mitigations. We are already seeing expectations about what Council will do in its	The translation of the People and Place Plan into the SIMP will be discussed with Homes NSW. It is understood that there is a desire for Stockland, Homes NSW, CHP providers and City of Sydney to have clear agreements about their responsibilities for delivery		

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	community facilities that does not match what Council may provide. For the SIMP to be actioned all responsible parties have to be in agreement about who is doing what, so all aspects of the plan are implemented in a way that makes the mitigations required. This agreement needs to include who is funding different aspects of implementing the SIMP. This is especially so if it is expected that NGO's are to be involved who may not be funded to deliver new services.	of SIMP mitigations and related funding.		
R8	SIMP Action Review and Recommendations Attached as Appendix A, forming part of this submission, are recommendations for areas to be added to or considered for adjustment in the SIMP. We have retained the SIMP structure so that our feedback is related to the specific SIMP area and is in response to the items listed in the plan, both the “technical mitigations and enhancements” and the “additional SIA recommendations”. We have also included the pre-mitigation and post-mitigation levels and the Social Significance Matrix level change as an indicator of the importance of the proposed mitigation.	The SIA and SIMP will be revised to reflect on the detailed comments provided (ie recommended additions and alterations to the SIMP “technical mitigations and enhancements” and the “additional SIA recommendations”, and prioritisation of mitigations). The considerable number of comments on the	Revise SIA (throughout) Revise SIMP (throughout)	NA

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	Attached as Appendix B, forming part of this submission, are SIA Impacts grouped by level of mitigation proposed in SIMP. The SIA actions are grouped by the Social Significance Matrix level shift between the magnitude level identified by an impact in the SIA with the magnitude level expected after the proposed mitigation. The higher the shift in the matrix level – the more important action on that identified impact is according to the SIA and SIMP. This grouping is helpful in prioritising areas where special attention should be paid to make sure mitigations work to deliver the desired outcome.	individual impact categories appended to the REDWatch submission will be reviewed in full as part of revision of the SIA and SIMP.		

Selection of community submissions:

Submission from Counterpoint Community Services (25 May 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1	Acknowledgement of Social Impacts – The inclusion of an SIA reflects longstanding community advocacy that redevelopment impacts extend beyond physical design and is welcomed. Appendix EE (Social Impact Assessment) identifies multiple High and Very High negative social impacts in the absence of mitigation and relies primarily on mitigation measures deferred to future design, governance, and operational processes, reinforcing the need for key social safeguards to be secured at the Concept SSD stage rather than assumed through later delivery.	It is noted that the SIA and SIMP should establish a robust, overarching framework for managing social impacts at the Concept Masterplan stage and future SSDA stages of development.	Revise SIA (throughout) Revise SIMP (throughout)	See also the DPHI and City of Sydney submissions
2	Cumulative and Long-Term Impacts – While disruption is acknowledged in the SIA, impacts are framed as temporary or precinct-specific, without enforceable safeguards against cumulative harm.	See above	See above	See also the DPHI, City of Sydney and REDWatch submissions
3	Social Impact Assessment — Acknowledgement Without Protection – The Social Impact Assessment marks an improvement in acknowledgement, but it does not, in itself, secure enforceable mitigation. It identifies high and very high risks, is scoped to Waterloo South, and relies heavily on future design, management, and engagement processes. For a long-staged renewal affecting residents with limited capacity to re-engage repeatedly, acknowledgement without conditions is not	See above	See above	See also the DPHI, City of Sydney and REDWatch submissions

	protection. At the Concept SSD stage, the consent authority can still secure the parameters that determine whether mitigation is feasible in practice.			
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Submission from Policy Watchdog Australia (13 May 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1	4.2 Binding Right-of-Return Commitments Are Absent at Concept Stage The EIS states that “Homes NSW and CHPs will work closely with existing tenants to ensure all existing social housing tenants have the option of being placed in new social housing in the new development, or to be relocated to another home, dependent on their preference.” This is not a legal commitment. It is a statement of intent. The distinction matters enormously for the 750 people currently living in the precinct. A decade or more of construction disruption lies ahead of them. The SIA rates relocation-related wellbeing impacts as “high negative” before mitigation — and then rates them as “low negative” post-mitigation on the basis of unspecified future management plans. The Waterloo South People and Place Plan and the Relocation and Support Guide are referenced repeatedly as mitigation tools, but neither is attached to the EIS as a binding commitment. The absence of a legally enforceable right of return at concept stage is a structural failure. Experience from comparable urban renewal projects in NSW — including the earlier stages of Waterloo North —	The revised SIA will consider tenants’ right-of-return, equivalent-accommodation commitments, and relocation support. The right of return is a Government commitment and is Homes NSW policy. The identification of Block 2D as housing for Aboriginal seniors remains as a commitment.	Revise SIA (throughout) Revise SIMP (throughout)	

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	demonstrates that tenants displaced during construction face systemic barriers to returning: reduced dwelling availability, changed eligibility criteria, health deterioration during temporary accommodation, and loss of established community ties. The People and Place Plan is a useful tool. It is not a substitute for a statutory condition. Particularly alarming is the treatment of Aboriginal tenants and seniors. The EIS identifies a specific building (indicated to be within Block 2D) as likely to be allocated for Aboriginal seniors. This is a positive design commitment. But it exists, at concept stage, only as an aspiration in a reference scheme that is, by definition, non-binding. Nothing in the current concept SSDA conditions would require that building to be delivered, or that its allocation to Aboriginal seniors be honoured. <i>Policy Watchdog Australia finds that existing tenants face a decade or more of disruption without legally enforceable right-of-return guarantees, equivalent-accommodation commitments, or binding relocation support obligations. The SIA's mitigation</i>			

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	<i>ratings are not credible in the absence of binding instruments. Conditions of concept approval must include enforceable right-of-return and relocation support obligations.</i>			
2	4.5 The Social Impact Assessment Systematically Converts High Negative Impacts to High Positives Through Unspecified Future Mitigation The Social Impact Assessment (SIA), prepared by Urbis, assesses 20 social impact categories. In eight categories, the “social impact without mitigation” rating is “high negative” or “medium negative.” In every single one of these cases, the SIA rates the “social impact post implementation of mitigation measures” as “high positive” or “very high positive.” This transformation — from high negative to very high positive across categories including community displacement, construction wellbeing, access to services, and First Nations cultural loss — is not supported by specified mitigation measures. It is supported by references to future plans. The categories rated “high negative” without mitigation include: changing social mix and impact on existing communities; significant physical, social and economic transformation; wellbeing impacts from relocation; improved safety (crime hotspot);	The revised SIA and SIMP will reconsider all impact ratings and will specify appropriate and specific mitigation measures across all impact categories, including ‘community engagement in decision-making’.	Revise SIA (throughout) Revise SIMP (throughout)	See also the City of Sydney and REDWatch submissions

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	and engagement with harder-to-reach communities. In each case, the mitigation strategy references a future document — the People and Place Plan, future Construction Management Plans, future detailed applications — rather than a committed action. The SIA then rates the mitigated outcome as positive. This is an analytical failure. An SIA that rates a high-negative impact as very-high-positive on the basis of measures that have not been designed, committed, or costed is not a rigorous impact assessment. It is a promotional document dressed in assessment methodology. The Department should not rely on this SIA as a basis for approving the concept SSDA without requiring the mitigation measures to be specified, costed, and committed to as binding conditions. Policy Watchdog Australia draws particular attention to the SIA’s treatment of “community engagement in decision-making” — rated “high negative” without mitigation. The pre-lodgement consultation programme, while reasonably extensive for a project of this scale, was conducted between October and December 2025 — a period of approximately six to eight weeks. The community being consulted			

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	includes people with low English proficiency, significant health challenges, and deep mistrust of government processes born of decades of housing policy failure. Two BBQ events, three tenant sessions, and two online sessions do not constitute meaningful participation in decisions about demolishing 750 homes.			

Submission from Councillor Ellsmore (2 June 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1	The comments and recommendations in this submission support those made by the City of Sydney's separate, detailed submission in regards to concerns about failures with the current proposal in relation to: built form, access and transport, future resident amenity, public domain and green spaces. In particular we note the detailed analysis in the City of Sydney's submission about the deficiencies in the Social Impact Assessment (SIA) and endorse these comments. The SIA is key document needed to address the high risk from this project of community conflict and poor social cohesion, arising from the creation of a new mixed estate co-located with a high-density public housing estate at Waterloo North. This submission also supports the detailed recommendations made by resident group REDWatch, who has worked actively to provide input on behalf of the community to this project for many years.	The revised SIA will give further consideration to comments from the City of Sydney, Councillor Ellsmore and REDWatch	Revise SIA (throughout)	See also City of Sydney and REDWatch submissions

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
2	5. Stronger and more specific actions included in the Social Impact Assessment There is no clarity about who, long term, is responsible for ensuring social impacts are managed. As the City of Sydney has rightly noted in its submission, the SIA has significant other gaps. We support their concerns and extend them with three recommendations. The first is the inclusion of stronger strategies to address the high risk of social conflict amongst mixed tenants. This will require an effective, long term, resourced management strategy which clearly allocates responsibilities for implementing different aspects. Our second recommendation is for clearer management strategies to be included that consider the needs of visitors and people who use the space such as rough sleepers and park drinkers and prevent their displacement. The development consortium should articulate and embed the right for all people to use and be part of public space.	The revised SIA and SIMP will give further consideration to strategies to address social conflict / support social cohesion, strategies to manage visitors such as rough sleepers and park drinkers, and strategies to manage potential conflict between construction workers and community members.	Revise SIA (throughout) Revise SIMP (throughout)	See also City of Sydney submission

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	The third recommendation is for stronger strategies to ensure lessons are learnt from the recent conflicts from the Metro construction, including strategies to manage conflict between construction workers and the existing community.			
3	6. Requirements that the social, health and wellbeing impacts of the project are documented and reported There are persistent and documented reports about the increase of mental health incidents, self-harm, people taking their lives and older people prematurely passing away, when public housing sales or renewal projects are undertaken. This was the case in Millers Point, the sale of the Sirius Building, and more recently 82 Wentworth Park Rd Glebe. There have already been informal reports received by our offices of self harm arising from the relocations for the Waterloo South project. Unfortunately, there is little formal reporting.	The revised SIA will consider mental health impacts including those related to relocation. Discussions will be undertaken with NSW Health regarding mental health data.	Revise SIA (throughout)	See also City of Sydney submission

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	It is essential that a requirement be included that mental health and incident data be collected, so that there can be better strategies and supports developed for the current and future renewal projects. This includes formal requirements to report incidents of self-harm, people taking their lives and older people prematurely passing away from this project.			

Submission from Redfern Legal Centre (2 June 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1	3. Differing views in the community on Waterloo Renewal ...We are pleased that the Social Impact Assessment and Social Impact Assessment Management Plan is detailed and acknowledges the needs of the current community. However, the perceived benefits of renewal rather than refurbishment could better and more transparently explained to the community, both in consultation and in documentation.	The revised SIA will consider feedback that reporting should include a clearer explanation of the perceived benefits of renewal (rather than refurbishment).	Revise assessment of social impacts	NA

2	7. Community Facilities RLC recommends that the 5,500 square metres set aside for community facilities be set aside only for not-for-profit organisations, with strong, ongoing connections in the community, and community facilities provided by City of Sydney Council, and do not include an educational facility. Redfern Legal Centre recommends that health facilities also be included but that they not replace community facilities...	Feedback proposing the inclusion of community facilities (for use by NFP organisations / or provided by the City of Sydney), excluding educational facilities, will be considered in the revised SIA.	Revise assessment of social impacts	See also Shelter NSW submission
3	8. Other facilities Accessibility for bicycles, walkways free from e-bikes, and public spaces that are accessible and safe for all are incredibly important for the Waterloo community. It is critical that all public spaces are accessible and safe for all tenants, regardless of the type of tenancy. Non-residential spaces must be accessible and aim to build community for all tenants. The public facilities and spaces must also take into account cultural considerations including the need for First Nations businesses, social enterprises and organisations, as well as community organisations that respond to cultural needs including those from non-English speaking backgrounds. Retail must be accessible to all tenants and in particular for those on low incomes. Retail must include local businesses and must not be over-priced or large companies with no connection to the local community or area.	The revised SIA will consider accessibility relating to movement, public spaces, public facilities and spaces, engagement with businesses / organisations and retail.	Revise assessment of social impacts	NA

4	9. Support and social infrastructure in place during construction phase Tenants have repeatedly expressed concern regarding the construction phase and while the Social Impact Assessment and Social Impact Management Plan do engage with this, further concrete commitments are required. RLC recommends that Homes NSW funding for an Independent Tenant Advocate should be ongoing. In addition, further commitments regarding accessibility for emergency services accessibility while there are road closures in place, resident safety around construction and management of noise and dust issues need to be made. RLC recommends that communication continue to be reviewed and improved, to increase community trust and continued engagement with the renewal process. We consider that social infrastructure and funded supports throughout the construction phase are crucial for current tenants.	The SIA and SIMP will be revised with regard to construction impacts and related mitigation measures.	Revise SIA and SIMP	NA
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Submission from Shelter NSW (2 June 2026)

No.	Comment	Response	Document changes (ie say which section of the SIA or SIMP will be updated)	Notes (ie say if this issue has also been raised in another submission)
1	i Community facilities and retail This project will provide 5,000sqm dedicated to community facilities. We note that the applicants are seeking to include educational establishments in the scope of what is to be provided on this site. Shelter NSW recommends that this allocation of non-residential floorspace is tailored to community need, not commercial interests. The successful tenants/operators of this floorspace should be non-profit with strong existing ties to the local community. Similarly, in considering the future uses of the non-residential floor space across the development, provisions should be made to attract affordable retailers. In conversations with current tenants, a desire for affordable grocers and food outlets specifically have been noted.	Feedback proposing the inclusion of community facilities (for use by NFP organisations / tailored to meet community need rather than commercial interests), and affordable retailers, will be considered in the revised SIA.	Revise assessment of social impacts	See also Redfern Legal Centre submission



Overview of Revised SIA Report Structure

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