



Russell Hand
Key sites and TOD Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

30 January 2026

Subject: Environmental Impact Statement – Waterloo Metro Quarter – Second Amending Concept (SSD-79307765) (City of Sydney)

Dear Russell,

Thank you for your referral received 26 November 2025, requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy the Environment and Water on the above project.

CPHR has reviewed the *Environmental Impact Statement* (Urbis, November 2025) and relevant supporting technical reports and provides its comments and recommendations at Attachment A. In summary:

- CPHR recommends that the building be redesigned to relocate the habitable use, the building management office, which is currently proposed in the basement under SSD- 10438-MOD 3.
- Climate change and floor level requirements should be considered further.
- The [Shelter-in-Place guideline for flash flooding](#) should be used to assess the suitability of sheltering in place for this development.
- Emergency management requires further consideration in consultation with the NSW State Emergency Service (SES).

Should you have any queries regarding this matter, please contact the Greater Sydney Planning team at rog.qsrplanning@dcceew.nsw.gov.au.

Yours sincerely,

Kerry Richardson
Director, Conservation Planning and Assessment
Conservation Planning and Offsets
Conservation Programs, Heritage and Regulation Group

CPHR comments on the Environmental Impact Statement – Waterloo Metro Quarter – Second Amending Concept (SSD-79307765) (City of Sydney)

Documents Reviewed

CPHR has reviewed the following reports:

- *Environmental Impact Statement* (Urbis, 6 November 2025)
- Appendix R – Flood Impact Assessment Second Amending Concept (WSP, 17 September 2025) (Second Amending Concept FIA)

The following additional documents were also considered in providing this advice:

- *Flooding Statement on Basement Car Park Finished Floor Levels modification* (WSP, 30 September 2025)
- *Flood Impact Assessment Northern Precinct* (WSP, 12 September 2025)
- *Flood Impact Assessment Central Precinct* (WSP, 12 September 2025)

CPHR notes that the base flood model used in the abovementioned flood impact assessments is different from that used for previous development applications for this project. Flood levels are also different. Several updated and new guidance documents have been released since the original development applications for the site, therefore, CPHR's recommendations below may differ from previous advice.

Key Assessment Issues

1.	<i>Basement use</i>	CPHR notes that this concept application relates to the central and northern precincts of the Waterloo Metro Quarter site. CPHR notes that the Northern Precinct (SSD-79307758) and Central Precinct (SSD-79307746) buildings are proposed over a shared basement which was approved under SSD-10438. A modification application (SSD-10438-MOD 3) to amend this shared basement has also been lodged and referred to CPHR for advice. Although the shared basement is not included in this SSD application, CPHR reiterates the concerns outlined in the Mod 3 advice letter that habitable uses – such as office spaces – are not suitable for basement levels. In addition, the building's proposed emergency management strategy relies on sheltering in place, and surrounding roads can experience high flood hazards. These factors 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 currently proposed within the shared basement under SSD-10438-MOD 3.
	<i>Extent and Timing</i>	Prior to determination
2.	<i>Flood planning levels and climate change</i>	CPHR notes that several areas in the northern precinct have floor levels that provide 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 Flood Impact Assessment (WSP, 12 September 2025) 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). The use of updated methodologies would likely produce higher predicted flood levels. Recommendation • Apply freeboard to retail floor levels. • Alternatively, use the latest methodologies in the Australian Rainfall and Runoff to develop more accurate estimates of changes to flood levels under climate change conditions.
	<i>Extent and timing</i>	Prior to determination
3.	<i>Emergency management</i>	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 or the floor level should be raised to the Probable Maximum Flood (PMF) level. Basement car parks should be avoided where a shelter in place strategy is adopted. Details should be provided explaining how the safety of basement occupants would be ensured in the event of a flood. Shelter in place (SIP) requires the flood impact assessment to address the considerations in the Shelter-in-Place guideline for flash flooding. The NSW SES should be consulted for advice. 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-in-place guideline for flash flooding. • Consult the NSW SES for detailed advice.
	<i>Extent and timing</i>	Prior to determination
3.	<i>Disclaimer</i>	CPHR notes that there is a disclaimer on page 115 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 considers the impact of assessing the proposed development with such a disclaimer.
	<i>Extent and timing</i>	Prior to determination

End of Submission