

15 January 2026

TfNSW Reference: SYD25-00069/02
DPHI Reference: SSD-79307758



Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Russell Hand

**EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT – PUBLIC AUTHORITY CONSULTATION
WATERLOO METRO QUARTER – NORTHERN PRECINCT
69-83 BOTANY ROAD AND 150 COPE STREET, WATERLOO**

Dear Ms Fishburn,

Thank you for referring the Environmental Impact Statement (**EIS**) for the abovementioned State Significant Development Application (**SSDA**) to Transport for NSW (**TfNSW**) for review and comment.

TfNSW has reviewed the submitted information and requests that the comments in **TAB A** be addressed in the applicant's Response to Submission/before the determination of the SSDA.

Please note that Sydney Metro will provide a separate submission on this SSDA, which should be read in conjunction with this letter.

Should you have any further inquiries in relation to this matter, please contact Andrew Lissenden, Acting Senior Land Use Planner, on 0418 962 703 or via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Aleks Tancevski".

Aleks Tancevski
Acting Director Technical Advice and Development Services
Transport Planning Branch
Planning, Integration and Passenger

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TAB A – Additional required information/comments to assist Department of Planning, Housing & Infrastructure (DPHI) with their assessment

1. Drainage

Comment

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

2. Loading and Deliveries

Comment

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

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

- a) The available distance between the driveway, garage door, and footpath is insufficient to accommodate the longest service vehicle required to access the site. As such, service vehicles will be queued within the Botany Road road reserve (i.e. within the pedestrian/footpath area). Any queuing of service vehicles would adversely impact pedestrian movements along Botany Road and compromise the safety and efficiency of vehicular movements on Botany Road, noting the significant pedestrian movements that will result from current and planned public transport infrastructure upgrades and from this development.
- 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.
- c) A preliminary review of the swept path analysis for the loading dock area (Appendix 3 in Appendix R) indicates that service vehicles are unable to enter and exit the site simultaneously while maintaining the required clearances. In addition, the swept path diagrams demonstrate that vehicles would encroach into the adjoining traffic lane on Botany Road to complete the necessary manoeuvres. This arrangement is not acceptable given the scale and demands of the subject development, as it would adversely impact the safety and operational efficiency of both pedestrians and vehicles on Botany Road, including public transport. Please note that TfNSW has not undertaken a detailed review of the swept paths provided for the loading dock area.
- d) TfNSW notes that a significant amount of retail and commercial floor space is proposed to be serviced by the shared loading dock. TfNSW has concerns that insufficient space has been provided to accommodate the ongoing servicing and loading demands of both the northern and central precincts (e.g. non-compliance with the suggested minimums). In addition, the proposal does not address the servicing requirements associated with occupants moving in and moving out of the 500-room co-living and 314 residential apartment components of the development. This will be primarily undertaken by vehicles that will need access to the shared loading dock, given their size.
- e) Noting the comments above, insufficient information has been provided regarding the operational management of the loading dock. A more detailed Delivery and Servicing Plan is required to demonstrate how site generated servicing demands will be managed to ensure that vehicle queuing at the loading dock entry does not occur and that impacts on pedestrians and the adjoining road network are avoided. Further guidance on site delivery and servicing should be sought from [delivery-and-servicing-plan-guidance.pdf](#).

3. Bicycle Parking

Comment

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

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TAB A – Additional required information/comments to assist Department of Planning, Housing & Infrastructure (DPHI) with their assessment

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.

4. Green Travel Plan

Comment

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

- a) **Mode Share Targets:** It is recommended that the mode share for 'Car (as driver or passenger)', as detailed in Section 9.3, should be reduced and public and active transport mode shares increased for residents, visitors, retail and commercial staff. These mode shifts need to be split into short-term, moderate, and long-term mode shares. GTP actions or initiatives to achieve these new splits of modal shares should be included in the Implementation Plan.
- b) **Bicycle parking and End of Trip Facilities (**EoT**):** These need to be monitored over time to ensure sufficient supply to encourage active transport. Further, the bicycle parking should be flexible to allow for parking of other micromobility options, as they come on stream. The bicycle parking should be safe, secured and under cover.
- c) **Implementation Plan: Section 10: Proposed Action Items,** should be changed to an Implementation Plan with committed actions ready for implementation from Day 1 of occupancy, including committed (not proposed) initiatives to encourage adoption of sustainable transport behaviour. The Implementation Plan should include timeframes for carrying out the actions and identify who is responsible, timing and dates, as well as funding for the initiatives. Sustainable transport options should be prioritised over parking initiatives. Please find these helpful reference materials from our NSW Government Travel Demand Management website - [Examples of hard activities](#) and [Example of soft activities](#).
- d) **Travel Access Guide (**TAG**):** The TAG needs to cater to everyone who is using the proposed development site, including residents, visitors, and childcare and retail staff. The TAG should be regularly updated, as well as when new infrastructure and micromobility services come online. The aim of the TAG is to reduce single occupancy car use and encourage sustainable transport journeys to and from the site using public and active transport. The TAG should include:
 - i) A comprehensive zoomed-out map showing all modes of public and active transport, including trains, buses, walking and cycling routes, as well as times for these public transport options, as well as clear guidance on the site location.
 - ii) A comprehensive zoomed-in map that provides information on the location of the internal facilities of the building, promoting bicycle parking and EoT facilities such as showers, lockers and change rooms for all users of the site.
 - iii) Breaking up text with photos.
 - iv) Provide information advising that service routes and timetables for trains and buses is available on the Trip Planner at transportnsw.info/.
 - v) Provide information about walking and cycling is available on the Trip Planner at transportnsw.info/.
 - vi) Provides clear messaging to residents, visitors and childcare and retail staff regarding active and public transport options, and any information on carpooling.
 - vii) For further helpful information – please check this link - [Travel plan toolkit | NSW Government](#).
- e) **Travel Survey:** A Travel Survey be included as a separate appendix to survey for visitors and childcare and retail staff. The survey should have questions to obtain residential postcodes to help inform strategies that help reduce car use to and from the site. Active and public transport initiatives placed in the Implementation Plan should be used in questions to encourage more uptake of these. For further information, please visit - [Online staff travel survey](#).
- f) **Governance of GTP:** A Travel Coordinator needs to be appointed in the occupation phase and advised as an action in the above Implementation Plan. The Travel Coordinator will be responsible for the whole site with a supporting steering committee, to progress this plan. The development needs to have a strategy if the Travel Coordinator role is not extended for the life of the development so that the ongoing responsibilities for the GTP are still able to be undertaken effectively to achieve sustainable transport mode shares for the life of the development.