

7 February 2025

TfNSW Reference: SYD25/00070/01
DPHI Reference: SSD-79307746

Ms Kiersten Fishburn
Secretary
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Russell Hand

**WATERLOO METRO QUARTER - CENTRAL PRECINCT – ADVICE ON SEARs
150 COPE STREET, WATERLOO**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) with an opportunity to comment on the Secretary's Environmental Assessment Requirements (**SEARs**) for the Waterloo Metro Quarter - Central Precinct at 150 Cope Street, Waterloo.

TfNSW appreciates the opportunity to review the draft SEARs and provides its suggested additions and changes in the attached draft SEARs.

Please note that Sydney Metro will provide comments separately on the Draft SEARs for this SSD. Any Sydney Metro comments do not replace or override the comments provided in this submission.

For more information, please contact Jim Tsirimiagos, Land Use Planner, on 0412 376 198, or by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Lissenden".

Andrew Lissenden
A/Senior Manager Land Use Assessment Eastern
Land Use, Network & Place Planning
Transport Planning | Planning, Integration and Passenger

Development details

Application number	SSD- 7930774679307765
Project name	Waterloo Metro Quarter – Central Precinct Second Amending Concept SSD
Location	Waterloo Metro Quarter – 150 Cope Street, Waterloo
Applicant	WL Developer Pty Ltd
Date of issue	ADD

Content and guidance

Any Environmental Impact Statement (EIS) must meet the minimum form and content requirements as prescribed by Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the *State Significant Development Guidelines*.

Relevant policies and guidelines can be found at <https://www.planningportal.nsw.gov.au/major-projects/assessment/policies-and-guidelines>.

Key issues and documentation

Issue and Assessment Requirements	Documentation
1. Statutory Context - Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies, guidelines and planning circulars. - Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. - Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences. - Address the requirements of any approvals applying to the site, including concept approval, any endorsed or draft master plan, precinct plan or any recommendation from a Gateway determination. - Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.	Address in EIS

2. Estimated Development Cost and Employment • Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report. • Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	• EDC Report
3. Amending Concept Proposal • Describe how the existing Concept Approval (SSD 9393) will be amended to make it consistent with the Amending Concept Proposal. • Illustrate the amendments sought to the existing Concept Proposal, including comparative analysis of building envelopes, floor space, uses and any relevant conditions of consent. • Illustrate, if relevant, any dependencies with infrastructure approval components of the Waterloo Metro station (CSSI 7400). • Illustrate how the development integrates with the Waterloo Metro Station and surrounding public domain. • Outline the Amending Concept Proposal's relationship with any subsequent approvals/stages of the development, including the construction/delivery of other components of the Over Station Development and the staging of relevant works and events.	• Address in EIS
4. Design Quality • Demonstrate how the development will achieve: ○ design excellence in accordance with any applicable EPI provisions. ○ good design in accordance with the seven objectives for good design in <i>Better Placed</i>. • Demonstrate that the development: ○ would be carried out in accordance with the endorsed Design Excellence Strategy; ○ has been reviewed by Design Review Panel (DRP) where required. • <u>Recommendations of the DRP are to be addressed prior to lodgement.</u> • <u>how the guidelines to address design quality of the building material and public realm will address risk associated with terrorism i.e. blast mitigation, hostile vehicle barrier etc.</u>	• Design Excellence Strategy • Design Review Report
5. Built Form and Urban Design • Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.	• Architectural drawings • Design Report • Survey Plan

• Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. • Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, activation, roof design, materials, finishes, colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements.	• Building Code of Australia Compliance Report • Accessibility Report
6. Environmental Amenity • Address how good internal and external environmental amenity is achieved, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces. • Assess amenity impacts on the surrounding locality, including lighting impacts, reflectivity, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated. • Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development (if relevant). • Provide an assessment of the development against the Housing SEPP and the <i>Apartment Design Guide</i>.	• Shadow Diagrams • Design Verification Statement • Housing SEPP Assessment • View Analysis • Pedestrian Wind Environment Assessment
7. Visual Impact • Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. • Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	• Visual Analysis • Visual Impact Assessment
8. Public Space • Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department. • Demonstrate how the development: ○ ensures that public space is welcoming, attractive and accessible for all.	• Public Space Plan (as part of the Design Report) • CPTED Report

○ maximises permeability and connectivity. ○ maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. ○ maximises street activation. ○ minimises potential vehicle, bicycle and pedestrian conflicts. • Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with <i>Crime Prevention and the Assessment of Development Applications Guidelines</i>.	
9. Trees and Landscaping • Provide a site-wide landscape plan, that: ○ details the proposed site planting, including proposed canopy coverage (as a percentage of the site area). ○ demonstrates how the proposed development would: ▪ contribute to long term landscape setting in respect of the site and streetscape. ▪ mitigate the urban heat island effect and ensure appropriate comfort levels on-site. ▪ contribute to the objective of increased urban tree canopy cover. ▪ maximise opportunities for green infrastructure, consistent with <i>Greener Places</i> and having regard to any bush fire risk.	• Landscape Plan
10. Ecologically Sustainable Development (ESD) • Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. • Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. • Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	• ESD Report
11. Traffic, Transport and Accessibility <u>(Construction and Operation)</u> • <u>Provide a transport (including public and point to point transport), pedestrian, bicycle, parking, delivery, servicing and accessibility impact assessment.</u>	• Transport and Accessibility Impact Assessment • Construction Traffic Management Plan • Green Travel Plan or equivalent

- The applicant should refer and use TfNSW's *Guide to Transport Impact Assessment (GTIA)* to assess the multimodal transport network impacts in relation to the Second Amending Concept Proposal.
- The Applicant's assessment should address/contain, but not be limited to, the following:
- Provide a transport and accessibility impact assessment, which includes:
 - an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current and future daily and peak hour ~~vehicle~~ movements of vehicles accessing the site, and existing performance levels of nearby intersections and any potential road network impacts. The analysis should also outline public transport, point-to-point transport, pedestrian, and bicycle movements within the precinct.
 - an analysis of pedestrian and cyclist access from Botany Road, Raglan Street, Wellington Street, and Cope Street, identifying existing barriers to public transport services and recommending future improvements to support pedestrian and cycling accessibility to the Waterloo Metro Quarter. This analysis should also demonstrate how pedestrian safety and amenity will be provided along Raglan Street, the shared laneway located between Raglan Street and Cope Street plaza and designed to prioritise pedestrian movements, including any measures to protect pedestrians entering and exiting the building and retail outlets.
 - details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading.
 - analysis of the impacts of the proposed development during construction and operation (including justification for the methodology used), including the current and predicted modal split (and comparing this to the previously approved concept plan), a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments. The analysis should benchmark and utilise low maximum car parking rates to encourage mode shift as appropriate to the other station and renewal precincts (example below).

Land use	Bays West (on exh)	Central SSP (on exh)	Waterloo	Crows Nest
Residential	0 spaces/ studio 0.25 spaces/ 1 bedroom unit 0.5 spaces/ 2 or 3 bedroom unit	0.3 spaces/ 1 bedroom unit 0.7 spaces/ 2 bedroom unit 1 space/ 3 bedroom unit	0.1 spaces/ studio 0.3 spaces/ 1 bedroom unit 0.7 spaces/ 2 bedroom unit 1 space/ 3 bedroom unit	0.25 spaces/ 1 bedroom unit 0.5 spaces/ 2 or more bedroom units
Commercial	1 space/ ~1,100m ² GFA	1 space/ 2,000m ² GFA	1 space/ 435m ² GFA	1 space/ 400m ² GFA

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- should there be any impacts from the changes in the Concept Proposal on the road network's operation, the applicant should demonstrate how it proposes to mitigate any negative effects on key roads including Botany Road, Raglan Street, Wellington Street, and Cope Street.
- assessment and details of proposed delivery and service vehicle access arrangements, including service vehicle parking, a draft Delivery and Servicing Plan detailing loading dock and servicing provision, adequacy and management with consideration of precinct wide shared loading docks and/or remote or off-site loading zone hub facilities, ensuring all servicing and loading occurs on-site and do not rely on kerbside controls.
- a queuing analysis of the service vehicle access arrangements to demonstrate that there are no negative impacts caused to Botany Road from the loading dock, or to people walking and cycling in the precinct. The queuing analysis should also show that vehicles would not queue onto Botany Road from the loading dock.
- measures to mitigate any traffic impacts on the operation of existing and future traffic, public transport, pedestrian and bicycle networks, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including proposed arrangements with local councils or government agencies) of any infrastructure improvements in accordance with relevant standards.
- proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan.
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- Provide a Construction Traffic Management Plan detailing predicted construction vehicle routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.
- In relation to construction traffic:

- details of vehicle routes, peak hour and daily truck movements, hours of operation, access arrangements and traffic control measures for all demolition / construction activities.
- an assessment of road safety at key intersections and locations subject to pedestrian / vehicle / bicycle conflicts.
- details of temporary cycling and pedestrian access and end of trip facilities during construction.
- an assessment of the likely construction traffic impacts, such as required road / lane closures and diversions, impacts on bus and 'point to point' transport, impacts on pedestrian and cycle movement, and taking into account other construction activities within this part of the Waterloo precinct, such as this station (northern and southern precincts) and other stations along the Sydney Metro City and Southwest.
- details of proposed mitigation measures should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified.
- preparation of a draft Construction Pedestrian and Traffic Management Plan to demonstrate the proposed management of impact. This Plan needs to include works zone location, vehicle routes, number of trucks, hours of operation, indicative construction program, access arrangements and traffic control measures for all demolition/construction activities.

12. Biodiversity Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted.	Biodiversity Development Assessment Report or BDAR Waiver
13. Noise and Vibration Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Noise and Vibration Impact Assessment
14. Flood Risk - Identify the flood planning level as set out in the relevant council LEP or SEPP and identify any: - flood risks on site having regard to adopted flood studies	Flood Impact Risk Assessment

○ the potential effects of climate change, and ○ any relevant provisions of the <i>NSW Flood Risk Management Manual</i>. • Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the <i>Flood Impact and Risk Assessment Guideline - LU01</i> (FIRA guide). When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered. • Detail any flood risk management measures that are to be incorporated as part of the development having regard to relevant guidelines (including any design solutions, flood modification measures, property modification measures, operational procedures or Flood Emergency Response Plan).	
15. Contamination and Remediation • In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	• Preliminary Site Investigation If required: • Detailed Site Investigation • Remedial Action Plan • Preliminary Long-term Environmental Management Plan
16. Waste Management • Identify, quantify and classify the likely waste streams to be generated during construction and operation. • Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste in accordance with any council waste management requirements. • Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site. • If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	• Waste Management Plan • Hazardous Material Survey
17. Aboriginal Cultural Heritage • Where there is potential for direct or indirect impacts on Aboriginal cultural heritage, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to Aboriginal cultural heritage sites or values associated with the site.	• Aboriginal Cultural Heritage Assessment Report

18. Environmental Heritage • Provide a Statement of Heritage Impact (SOHI) prepared by a suitably qualified consultant in accordance with the Guidelines for preparing Statements of Heritage Impact. The SOHI is to address the impacts of the proposal on the heritage significance of the site and adjacent areas and is to identify the following: ○ all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items, and assessment of why the items and sites are of heritage significance. ○ compliance with the relevant Conservation Management Plan. ○ the impacts of the proposal on heritage item(s) including visual impacts. ○ the attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items. ○ justification for any changes to the heritage fabric or landscape elements including any options analysis.	• Statement of Heritage Impact • Archaeological Assessment
19. Social Impact • Provide a Social Impact Assessment that: ○ is prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>. ○ is targeted and proportionate to the project's context and likely impacts.	• Social Impact Assessment
20. Infrastructure Requirements and Utilities • In consultation with relevant service providers: ○ assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. ○ identify any infrastructure required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. ○ provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	• Infrastructure Delivery, Management and Staging Plan
21. Affordable Housing • If affordable housing is being proposed, provide documentation which specifies the name of the registered community housing provider who will manage the affordable housing component of the development in accordance with legislated timeframes.	• Address in EIS

22. Construction, Operation and Staging If staging is proposed, provide details of how construction and operation would be managed, and any impacts mitigated.	Address in EIS
23. Contributions and Public Benefit - Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit. - Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	Address in EIS
24. Engagement - Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised, and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: - the relevant Department assessment team. - any relevant local councils. - any relevant agencies. - the community. - if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.	Engagement Report