



beam

Scoping Report

Stage 2 SSDA (Building 2D)
Waterloo Estate (South) Building 2D

Prepared for Stockland and NSW Land and Housing Corporation

Beam Planning acknowledge that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia. We pay respect to Elders past and present and commit to respecting the lands we walk on, and the communities we work with.

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1.0 Introduction

1.1 Overview

The Waterloo Renewal Project is set to be one of Australia's largest and most significant inner city urban renewal initiatives, transforming an aged purpose-built and inward facing social housing estate into a safe, socially inclusive and sustainable mixed tenure community. The State Government's vision for the project is:

"To create a new and unique urban village on the Project Land (Gadigal Country) which delivers new homes, community places and green spaces with diverse housing choice and amenity; welcomes neighbours and visitors; prioritises the health and wellbeing of residents; and offers an authentic sense of place."

This Scoping Report has been prepared by Beam Planning for Stockland on behalf of NSW Land and Housing Corporation (the Applicant) to support a State Significant Development Application (SSDA) for the delivery of Stage 2 (Building 2D) of the redevelopment of Waterloo Estate (South). The land identified as Waterloo Estate (South) is identified in **Figure 2**. This Scoping Report relates to works on Building 2D of Waterloo (South), as shown in **Figure 3**.

This report seeks to identify and introduce the key matters and consultation requirements associated with the proposal and requests the issuance of industry specific Secretary's Environmental Assessment Requirements (SEARs) for the Stage 2 (Building 2D) SSDA. The project is eligible for industry specific SEARs as it is residential development on behalf of the Land and Housing Corporation with an estimated development cost of more than \$30 million pursuant to Section 26 of *State Environmental Planning Policy (Planning Systems) 2021*.

Building 2D is intended to be designed as social housing and Independent Living Units, providing housing options for Aboriginal seniors. Birribee Housing, an Aboriginal Community Housing Provider, has applied for HAFF3 funding to purchase this building on completion from Homes NSW.

The Stage 2 (Building 2D) SSDA will seek Crown development consent for the following works in the boundary of Block 2D:

- Site preparation works including:
 - Tree removal required to facilitate the development (undertaken in accordance with the Concept SSDA and subject to a detailed arborist assessment).
 - Demolition of any remaining buildings and structures on the site, including associated disconnection and decommissioning/capping of services
 - Bulk excavation and shoring.
 - Remediation of soils and dewatering.
 - Augmentation and/or extension of utility services, as required
- Construction of approximately 94 social housing dwellings, including ~49 seniors housing independent living units (ILUs) across an eight (8) storey building. In addition to residential accommodation, the ground floor comprises the loading dock and communal area and/or non-residential use fronting John Street.
- Construction of 1 x basement level to accommodate services, storage and car parking.
- Infrastructure, public domain and publicly accessible private open space:
 - Upgrades to the northern portion of John Street and improvements, widening and dedication to the western extent of Cooper Street.
 - Site wide public domain interface works and improvements such as new footpaths.

Certain works are excluded from the scope of this Stage 2 (Building 2D) SSDA but are relevant to the overall project. These include:

- Demolition of buildings and structures, tree removal and decommissioning of services (to be undertaken in a Review of Environmental Factors to prepare the site for redevelopment). Note: While the bulk of these works will be addressed separately, some services decommissioning, augmentation and/or diversion may still be required under the Stage 2 (Building 2D) SSDA.
- The detailed fit-out and operation of any non-residential use areas.
- The installation of signage including but not limited to precinct wayfinding signage, building identification signage and the like.

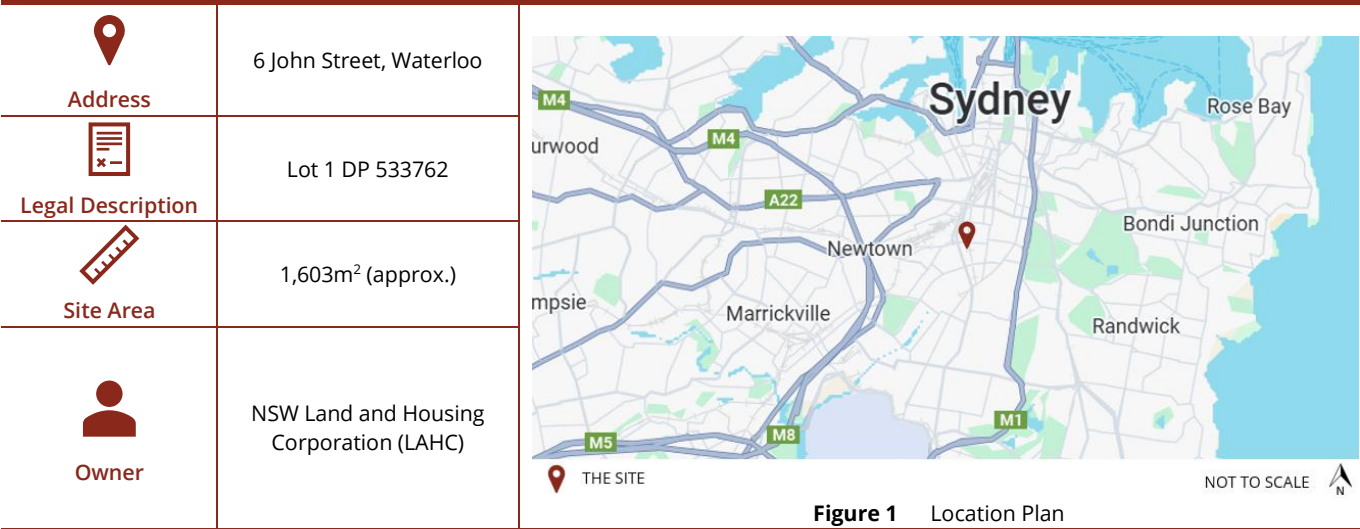
This Scoping Report has been prepared in accordance with the State Significant Development Guidelines adopted by the Department of Planning, Housing and Infrastructure (the Department) in March 2026 and provides an overview of the project, sets out the statutory context for the site and identifies the key likely environmental and planning issues that will be considered as part of the Stage 2 (Building 2D) SSDA.

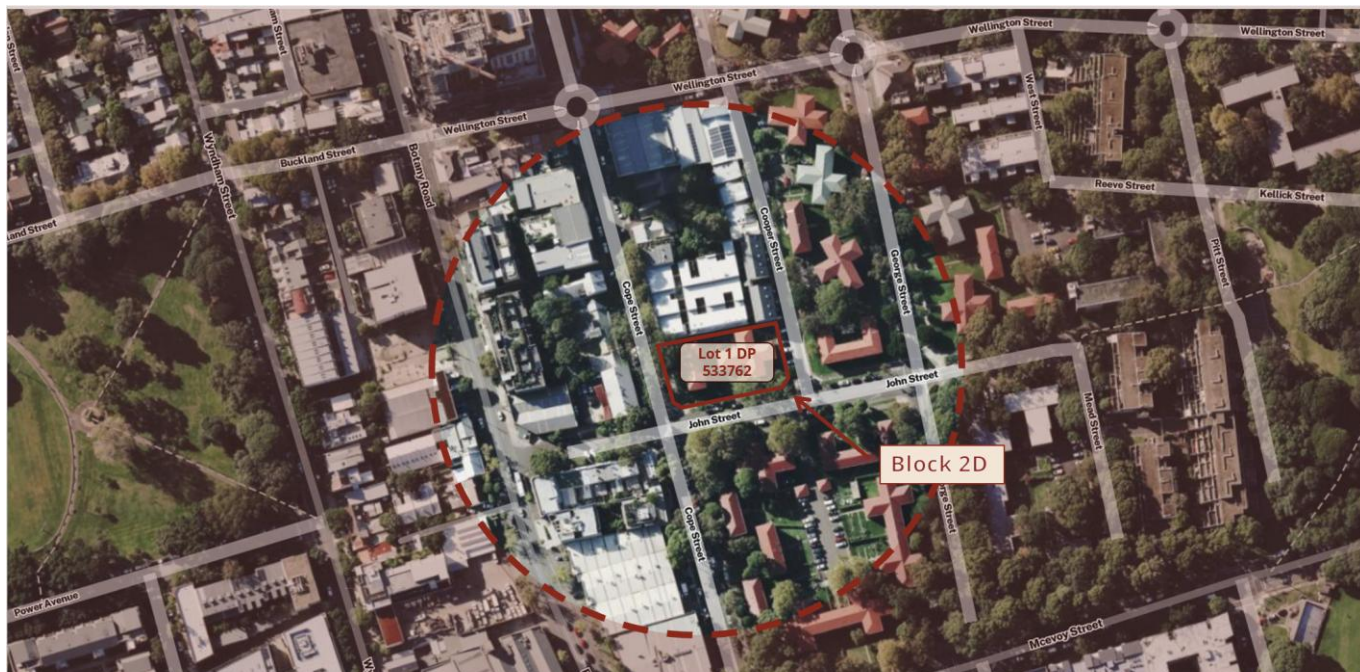
1.2 The Site

The broader Waterloo South Precinct Area extends across 10 street blocks within the inner-city suburb of Waterloo. Waterloo South is generally bound by Cope, Raglan, George, Wellington, Gibson, Kellick, Pitt and McEvoy streets (**Figure 2**). The site is located on the traditional land of the Gadigal people of the Eora Nation. The location of the precinct in the context of the Sydney CBD is illustrated in **Figure 1**.

This SSDA relates only to Building 2D of Waterloo South, which is part of the second stage of the Waterloo South redevelopment (see **Figure 2**, **Figure 3** and **Figure 4**). Building 2D is located in the western portion of the site and is bound by 233 Cope Street (privately owned land) to the north, Cope Street to the west, John Street to the south and Cooper Street to the east.

The legal description of the land subject to this SSDA is Lot 1 in DP 533762. The location of the precinct in the context of the Sydney CBD is illustrated in the figures below.

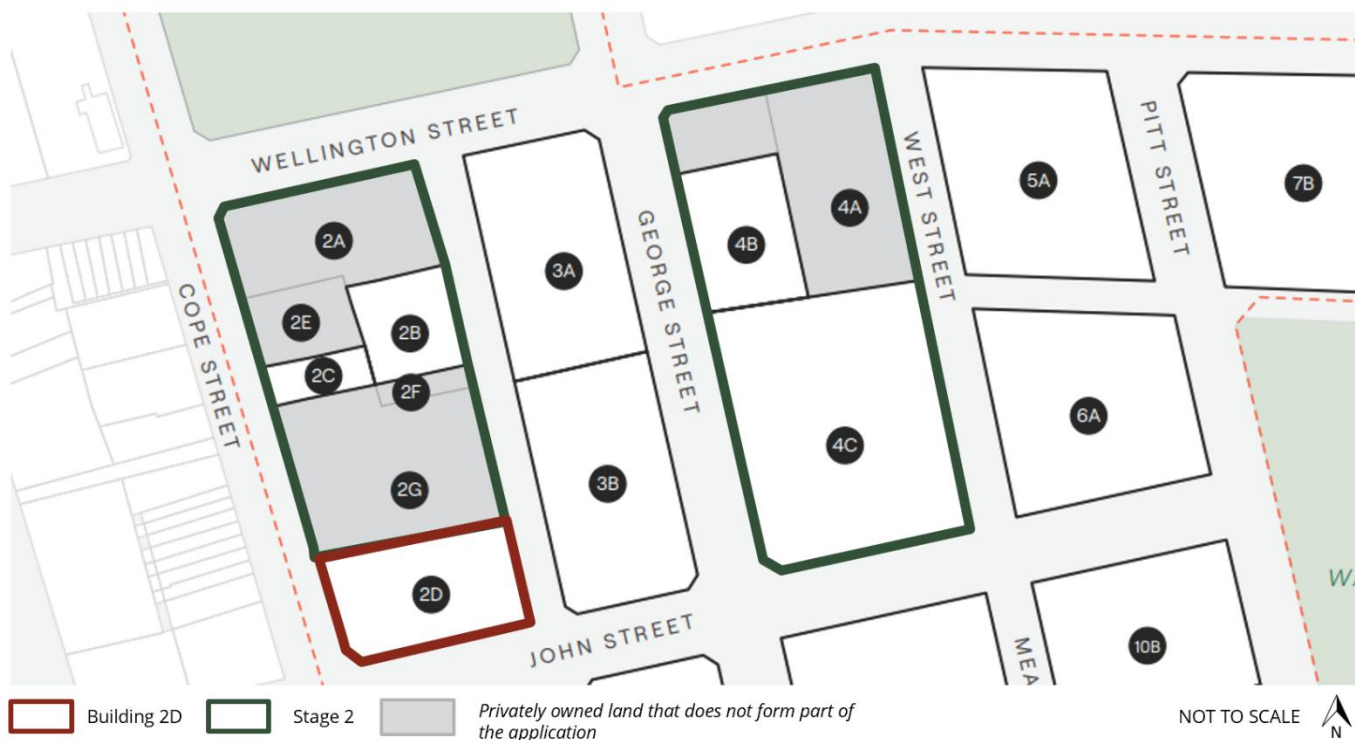




 Stage 2 (Block 2D)

NOT TO SCALE

Figure 3 Stage 2 Building 2D SSDA Extent
Source: SDT Explorer, modified by Beam Planning



 Building 2D Stage 2 Privately owned land that does not form part of the application

NOT TO SCALE

Figure 4 Identification of Waterloo South Stage 2
Source: SJB

1.2.1 Key site features

Key features of the site are described in **Table 1**.

Table 1 Key Site Features

Feature	Site details
First Nations History	Waterloo South is situated on the traditional lands of the Gadigal people of the Eora Nation. The Gadigal clan is one of the 29 clans of the Sydney basin which make up the Eora Nation. The site formed part of a broader landscape of swamps, creeks and woodlands that supported a rich and interconnected system of life and culture long before European settlement. Waterloo formed part of an important seasonal movement route for the Gadigal people and neighbouring clans. The abundance of water and vegetation created a fertile landscape for gathering, storytelling and cultural practices. These cultural ties persist today through ongoing connections maintained by the local Aboriginal community. When the British invaded, most Aboriginal people were displaced from the city, either moving away or being forced onto reserves and missions. However, during the Great Depression in the 1930s, many Aboriginal people moved to Redfern for refuge as rural jobs became scarce. By the 1960s, the Aboriginal population around Redfern numbered over 12 000, increasing to 35,000 in the 1970s. From the 1960s, Redfern was the centre of the urban Aboriginal civil rights movement in Australia. The creation of Aboriginal-led services in the 1970s, including the Aboriginal Medical Service, the Aboriginal Legal Service, and the Metropolitan Local Aboriginal Land Council (LALC), served as a powerful inspiration for self-determination among Aboriginal communities across the country. Since the early 2000s, redevelopment has contributed to a decline in the local Aboriginal and Torres Strait Islander population. The 2021 Census recorded 834 Aboriginal people in Redfern and Waterloo. Despite major urban change, Waterloo remains a place of enduring cultural significance for many Aboriginal and Torres Strait Islander people. Redfern continues to host significant Aboriginal and Torres Strait Islander organisations, services, cultural institutions and businesses, including those that evolved from the earliest organisations established there. Many Aboriginal people still travel to Redfern to access community-controlled services, attend events, connect with family and friends, and sustain and pass on connections to the area's history and cultural significance.
Infrastructure	The site is served by arterial roads, heavy rail train stations, a Sydney Metro station, bus routes and regional cycle routes. These connections mean access to Central Sydney is fast and efficient, with a full suite of transport options and low travel times. Access to most of Greater Sydney is relatively high through well connected and high-capacity railways and arterial roads. Arterial roads connect the site to Greater Sydney, including Parramatta Road via Cleveland Street, the M8 motorway and Princes Highway via McEvoy Street, and Sydney Airport and North Sydney via the Eastern Distributor. McEvoy Street bounds the site to the south and is a classified road and arterial road. McEvoy Street is an important east-west link that connects to Botany Road and South Dowling Street. Botany Road is located to the immediate west of the site and South Dowling Street which is located further to the east of the site. Botany Road is a key corridor that connects the southern industrial lands and Sydney airport to the Sydney CBD in the north, whilst South Dowling Street provides connections to the city north and eastern suburbs. The site is surrounded by a series of local roads, with the intent of the precinct to become more pedestrianised. The site is well located and in walking distance to several heavy rail and metro stations including Waterloo Metro Station, Green Square Station, and Redfern Station and the City of Sydney have committed to improving active transport connectivity across the LGA. A new regional bike network runs directly through the site along George Street and provides connections to the broader network that spans the LGA.
Easements and Covenants	There are no easements or covenants on the subject site.
Services	The site is located within an existing urban area and currently contains all necessary services, including electricity, gas, water, communications, drainage and sewage. The proposed development will connect to these services with augmentation and upgrades as required, with any services no longer required to be decommissioned and capped. As part of the staged infrastructure delivery strategy that accompanies the concept SSDA, existing infrastructure will be capped at the block boundaries whilst existing infrastructure outside of the block boundaries will be retained.
Acid Sulphate Soils	The site contains Class 5 Acid Sulphate Soils. Approximately 270m southwest of Building 2D are Class 4 acid sulphate soils.

Feature	Site details
Contamination	The site contains potential sources of contamination, receptors and exposure pathways. Fill materials may be present on the site and could be impacted to varying degrees by heavy metals (notably lead), asbestos, TRH, and PAHs. Groundwater may also be impacted by heavy metals and perfluorooctane sulfonate (PFOS), potentially from historical commercial/ industrial land-uses within the Waterloo locality.
Topography	Building 2D sits a relatively low point of the broader Waterloo South area, meaning water naturally drains to the west to Cope Street.
Hydrology	Sheas Creek (brackish water body), is located approximately 850m to the south/southwest of the site. Sheas Creek flows to Alexandra Canal, which flows into the Cooks River (marine), approximately 1.3km to the southwest, which ultimately discharges into Botany Bay (marine), located around 6km from the site.
Stormwater and flooding	The site is located near the centre of the Alexandra Canal Catchment, which is prone to overland flow flooding during intense rainfall events when the capacity of the piped stormwater system is exceeded. The site is serviced by a stormwater network of pits and pipes that generally drains to the west and ultimately discharges to Alexandra Canal. Key elements of the network include drainage running west along Wellington Street and Raglan Street, multiple drainage lines along Cope Street draining to a small open channel flowing west, and drainage of the George Street low point via multiple pipes connecting to infrastructure running south from McEvoy Street.
Vegetation	There are several low, moderate and high retention value trees located adjacent to the site boundary of Building 2D which may be impacted as a result of the proposed redevelopment of Building 2D.
Heritage	The site does not contain any items of heritage significance, and the site is not located within a heritage conservation area. There are several locally listed heritage items in proximity to the site. The locally listed heritage items I2077 and I2078 are located north of Building 2D and comprises 'Former Waterloo Pre-school (225 Cope Street) including interior' and '2-storey Victorian terrace houses (circa 1880)' as identified in Figure 5 .
First Nations Heritage	Based on an AHIMS Extensive Search dated 22 August 2025 with a 1km radius from Lot 1 in DP533762 (approximately centre of the broader Waterloo South site) there are four (4) Aboriginal sites recorded near the site, three (3) of which are shown within Figure 5 . No Aboriginal sites have been recorded on the site.



Figure 5 Heritage Items and Heritage Conservation Areas Map (Waterloo South outlined in red, Building 2D in green)

1.2.2 Surrounding Context

The suburb of Waterloo is located within the City of Sydney Local Government Area (LGA) and is located 3km south of Sydney CBD. The site is part of the broader “Waterloo Estate”, which comprises the northern, central, and southern precincts and accommodates a significant community residing in social housing.

As shown in **Figure 2**, surrounding suburbs include Redfern to the north, Green Square to the south, Alexandria to the west and Zetland to the east. This broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Waterloo Metro Quarter and over station development (OSD) all contributing to the changing character of the area.

These broader renewal projects are supported by proximity to a range of public transport services, including Redfern Station, Green Square Station, and Waterloo Metro Station, all of which are within walking distance of Waterloo South.

The site is also well-served by nearby open space. Waterloo Oval is located approximately 350 metres to the south-east, providing active recreation opportunities, while Waterloo Park, a larger passive open space, is located within easy walking distance to the east. The site is also located within the immediate vicinity of future community facilities and open space that form part of the wider Waterloo South redevelopment.

1.2.3 Surrounding Development

- The immediate context of Building 2D is predominantly characterised by medium to high density residential development, with business and retail uses concentrated to the west, particularly toward Botany Road.
- To the north of Building 2D, are two- to three- storey medium density residential dwellings on privately owned land fronting Cooper Street and Cope Street (233–246 Cope Street and 111, 123 and 127 Cooper Street).
- To the south, the site fronts John Street. Opposite Building 2D, across John Street is Block 8 which currently comprises two- to three- storey medium density dwellings owned by the NSW Land and Housing Corporation. As detailed in **Section 2.2**, a concurrent detailed SSDA is being prepared for the redevelopment of Block 8.
- To the west of Building 2D is Cope Street, with residential and one- to four- storey residential dwellings west across Cope Street.
- To the east of the site is Cooper Street. Opposite Building 2D along Cooper Street is Block 3 which currently comprises two- and three- storey medium density residential dwellings owned by the NSW Land and Housing Corporation.

2.0 Background

2.1 Planning History

Strategic planning for the renewal of the Waterloo Estate has been ongoing for several years. In May 2020, the NSW Land and Housing Corporation (now a part of Homes NSW) lodged a request with the City of Sydney to amend the planning controls for Waterloo South. This followed the Minister for Planning and Public Spaces' announcement in November 2019 that designated the City of Sydney as the plan-making authority for the precinct.

The City of Sydney subsequently prepared a planning proposal that introduced key changes to the original proposal. These revisions aimed to increase affordable housing and provide dedicated housing for First Nations people. Additional changes were made to enhance the living environment, including:

- wider and more navigable streets and walkways
- a new main street with shops and services
- a greater proportion of medium-rise buildings
- fewer high-rise towers, strategically positioned at the southern edge to minimize overshadowing
- increased sunlight access and better wind management

The planning proposal also included a large park adjacent to the Waterloo metro station, a neighbourhood park, and spaces for community facilities, retail, and commercial uses. It introduced new land use zoning, building height, and floor space ratio (FSR) development standards. Additionally, site-specific provisions were incorporated into the Sydney LEP 2012, and the Design Guide was established as a key consideration for future development of the site under clause 7.29 and clause 7.30 of the Sydney LEP 2012.

In February 2023, a tripartite VPA was executed between the Department, the City of Sydney, and NSW Land and Housing Corporation in relation to the future development of Waterloo South.

2.2 Planning Process

As the State's largest social housing area, Stockland and Homes NSW are proposing to stage the delivery of the precinct to reduce disruption to existing residents on the site, whilst endeavouring to expedite the delivery of new homes in accordance with the objectives of the National Housing Accord.

The redevelopment will occur across several planning applications, as described below and expanded on in the following sections:

1. Concept SSDA (SSD-93222706) – A Concept SSDA is currently under assessment by the Department to establish the planning parameters for the future redevelopment of the site, as anticipated by the Design Guide.
2. State Assessed Rezoning Proposal (SARP) (SSD-93222706) – A Rezoning Proposal is currently under assessment, concurrent with the assessment of the Concept SSDA for coordinated amendments to the planning controls and supporting design framework.
3. Stage 1 – A Review of Environmental Factors (Project No. BH46L) has been approved for demolition and site preparation works at Blocks 8 and 9. Additionally, a Stage 1 (Block 8 & 9) Early Works SSDA (SSD-126100740) is currently being prepared and will be submitted to the Department. Subsequently two detailed SSDA's seeking consent for the redevelopment of Block 8 (SSD-126103740) and Block 9 (SSD-126105740) will be prepared and submitted to the Department.
4. Review of Environmental Factors – A REF is being prepared for the demolition and site preparation works for Building 2D.
5. Future Detailed SSDA(s) – Multiple detailed SSDAs will be prepared seeking approval for the construction of new social and affordable housing, market housing, community facilities, infrastructure and non-residential land uses as set out in the Concept SSDA.

Figure 6 illustrates the planning process and outlines the applications which have been or will be submitted in relation to Waterloo South. Further details regarding these applications is provided in **Sections 2.2.1-2.2.5**

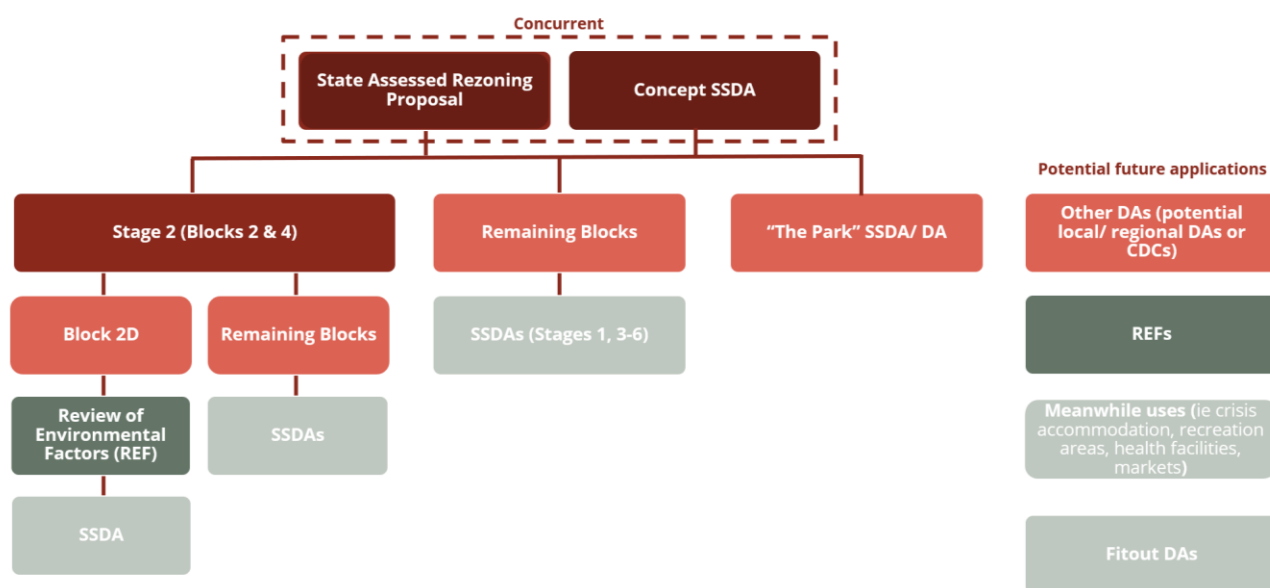


Figure 6 Planning Processes

Source: Beam Planning

2.2.1 State Assessed Rezoning Proposal (SSD-93222706)

Since the finalisation of the 2020-2022 planning proposal, Stockland, in collaboration with Homes NSW, has undertaken detailed design development, feasibility testing and delivery planning for the precinct. These investigations were undertaken to ensure the project can deliver upon the NSW Government commitment for the mix of social and affordable housing across the site, accommodate the residential typologies proposed to be managed by the Community Housing Providers (CHPs), and to look for opportunities to improve amenity and the overall quality of the precinct.

This process identified that the existing design/ framework did not adequately account for the application of the permitted design excellence bonus floor space. Further discrepancies were identified between different built form objectives and provisions including tree retention zones, survey plan details, building setbacks, and building height standards. As a result, a substantial quantum of permissible residential floor space could not be physically accommodated within the originally contemplated building envelopes, creating a disconnect between the planning controls and achievable development outcomes.

When the building envelopes were further tested and adjusted to incorporate the permissible design excellence bonus floor space, further refinements were required to maintain acceptable levels of residential amenity, public domain quality and interface outcomes, particularly in relation to streets, open spaces and key pedestrian routes. Without these refinements, the cumulative scale and massing of development would adversely impact the amenity and function of the public realm.

In parallel, detailed testing of residential floorplates identified inefficiencies in the originally contemplated layouts. These configurations were found unlikely to be operationally or economically viable, particularly for CHPs, which have specific requirements relating to dwelling mix, servicing, circulation, building efficiency and long-term management. Addressing these issues necessitated adjustments to built form parameters to enable more functional and deliverable residential outcomes.

These factors catalysed the need for coordinated amendments to the planning controls and supporting design framework in order to streamline and better align the statutory planning controls and the 2022 Design Guide, simplify building envelopes, and provide greater flexibility to deliver the permissible floor space in a manner that is efficient, legible and responsive to the site context. A comparison between the structure plan for the renewal of Waterloo South approved in the final 2022 planning proposal and the current Rezoning Proposal is provided in **Figure 7**.



Figure 7 Comparison between 2022 Structure Plan (left) and proposed 2026 Structure Plan (right)

Source: Design Report prepared by SJB

In September 2024 the NSW Government introduced the State Significant Rezoning Policy to facilitate strategically important rezonings through state-led or state-assessed processes. The program prioritises rezonings that address the State's growing housing and employment needs and contribute meaningfully to the delivery targets set under the National Housing Accord.

In line with the NSW Government's 'Program Guideline – Prioritising rezonings that deliver social and affordable housing' (May 2024), the Department's State Significant Rezoning Evaluation Panel determined on 10 June 2025 that the Waterloo South Rezoning Proposal meets the eligibility criteria for the State Significant Rezoning Program as a State-assessed Rezoning Proposal. The Panel subsequently supported this application to proceed under the state-assessed pathway.

The Rezoning Proposal was submitted concurrently with the concept SSDA to the Department for assessment, as is outlined in **Section 2.2**. The Rezoning Proposal was informed by pre-lodgement consultation with the City of Sydney, State Government Agencies, members of the community, and other relevant stakeholders. The Rezoning Proposal will facilitate the determination of the concept SSDA and guide the future staged development of Waterloo South.

Overall, the amended project strategy is intended to improve certainty for delivery, reduce reliance on site-specific variations at future stages, and ensure the planning framework effectively supports the NSW Government's commitment to delivering 50 per cent of residential floor space as social and affordable housing, while maintaining high-quality amenity and public domain outcomes.

2.2.2 Concept SSDA (SSD-93222706)

A concept SSDA was submitted on 17 April 2026 for the comprehensive redevelopment of Waterloo South, in accordance with section 4.22 of the EP&A Act. The concept SSDA will guide future applications relating to the detailed design of future buildings, public open spaces and the public realm within Waterloo South. It will seek concept development consent for key planning metrics as described below:

- Maximum building envelopes, including maximum building heights, street-wall heights and setbacks.
- Distribution of floor area across the Waterloo South precinct development blocks.
- Indicative allocation of floor space between social housing, affordable housing, market housing, community uses and other non-residential uses across the precinct.
- Loading, vehicular, pedestrian, and active transport access arrangements.
- Public domain upgrades and new public domain and publicly accessible areas.
- Indicative subdivision plan, staging plan and delivery sequencing for development.
- Several precinct-wide management plans and strategies to inform future stages of the development.

2.2.3 Stage 1 Applications

Review of Environmental Factors (Project No. BH46L)

A Review of Environmental Factors has been approved for Stage 1 of the development (Blocks 8 and 9). The works proposed include demolition and site preparation to facilitate the development, including the demolition of ten existing 2- and 3- storey buildings, associated and ancillary structures, removal of trees (limited to trees located within the immediate proximity of existing buildings proposed to be demolished), services infrastructure works associated with decommissioning the buildings, removal of surface level contaminated or hazardous materials.

Stage 1 (Blocks 8 & 9) Early Works SSDA (SSD-126100740)

The Stage 1 Early Works SSDA is currently being prepared to seek approval for tree removal, demolition of remaining buildings and structures, bulk excavation and shoring, temporary site establishment, retention and anchoring to facilitate basement construction and the remediation of soils and dewatering. Temporary and permanent utility works required to facilitate the early works, including disconnections, relocations, protection and temporary site services are also proposed, in addition to cap off and/or diversion of services, as required for the early works.

Stage 1 Block 8 SSDA (SSD-126103740)

The Stage 1 Block 8 Detailed SSDA is currently being prepared to seek approval for the demolition of any remaining structures on the site and the development of approximately 600 dwellings across five buildings. The development proposes to include three basement levels to accommodate services, storage and car parking and involves subdivision for the creation of development lots, stratum subdivision of basement levels, and stratum subdivision for mixed use buildings. Additionally, this application will include upgrades to the eastern half of Cope Street, southern portion of John Street and full extent of George Streets; in addition to public domain upgrades, including site wide public domain interface works and improvements, delivery of the Cooper Place internal ring road, and the establishment of through-site links, including associated easements. The application does not include the construction of the Block 8 park or community building as these will progress under a separate process established under the Waterloo South Voluntary Planning Agreement. They will consequently be the subject of a separate application.

Stage 1 Block 9 SSDA (SSD-126105740)

The Stage 1 Block 9 Detailed SSDA is currently being prepared to seek approval for the demolition of any remaining structures on the site and the development of approximately 500 dwellings across two buildings. The application proposes three basement levels to accommodate services, storage and car parking; the SSDA also involves subdivision for the creation of development lots, stratum subdivision of basement levels, and stratum subdivision for mixed use buildings. Additionally, this development application will include public domain upgrades, including upgrades to the southern portions of John Street and George Street, site wide public domain interface works and improvements, such as new footpaths, and the establishment of through-site links, including associated easements.

2.2.4 Stage 2 (Building 2D) Review of Environmental Factors

A Review of Environmental Factors (REF) is being prepared, in accordance with Division 5.1 Part 5 of the EP&A Act for Building 2D of the Waterloo South development, the first part of 'Stage 2' of the development. The works proposed under the REF include demolition, tree removal and site preparation to facilitate future development.

The scope of works to be approved under this REF include the following within the boundaries of Building 2D of the Waterloo South precinct:

- Demolition of two existing 3-storey buildings.
- Demolition of any associated and ancillary structures.
- Removal of trees.
- Services infrastructure works associated with decommissioning the buildings.
- Removal of surface level contaminated or hazardous materials.

Tree removal proposed under the Stage 2 (Building 2D) REF is limited to trees located within the immediate proximity of existing buildings proposed to be demolished and does not include any street trees, or trees located outside of the boundaries of Building 2D of the Waterloo South Precinct Area.

2.2.5 Future Detailed SSDAs

The redevelopment of Waterloo South will be delivered through a staged approach across 10-15 years, reflecting the scale and complexity of the precinct. Staging is intended to support the orderly redevelopment of the site, minimise disruption to existing communities, ensure safety, facilitate the progressive delivery of housing (including social and affordable housing), and enable timely provision of public open spaces, community facilities, and supporting infrastructure as required by the VPA.

Detailed SSDAs are being prepared for Blocks 8 and 9 (Stage 1) and the SSDA Stage 2 (Building 2D) relates to Building 2D, forms part of Stage 2 (See **Figure 3**) and is being prepared concurrently to the Stage 1 detailed SSDAs. Together, these stages comprise the first of six built-form stages of the Waterloo South development. Any reference to “Stage 2” or any preceding or subsequent stages of the development refers to the anticipated staged delivery of the precinct as illustrated in **Figure 8**.



Figure 8 Proposed Development Staging Plan

Source: Design Report prepared by SJB (note: Building 2D is noted as part of Stage 2 in the above, outlined in red)

3.0 Strategic Context

This section provides a concise overview of how the proposal aligns with key strategic objectives of the strategic framework guiding the site, including demonstrating consistency with the relevant Region and District Plans, as well as the City of Sydney Local Strategic Planning Statement (LSPS) and City of Sydney Local Housing Strategy. It also considers the strategic planning initiatives impacting the surrounding area and addresses the Government priorities relating to the ongoing housing crisis, as well as the draft Sydney Plan.

The proposal is consistent with, and gives effect to, the strategic planning framework applying to Waterloo South, including the precinct's long-term renewal objectives. The development is uniquely placed to support a range of government priorities relating to housing supply and urban renewal.

The broader Waterloo South redevelopment will ultimately deliver approximately 3,300 new dwellings, comprising 30 per cent social housing, approximately 20 per cent affordable housing, and up to 50 per cent market housing, together with community and non-residential uses in a highly accessible location. Stage 2 (Blocks 2 & 4) alone will provide approximately 396 new dwellings, making a substantial contribution to addressing the current housing crisis and advancing the State's commitments under the National Housing Accord.

The proposed development is uniquely positioned to facilitate the achievement of numerous government initiatives relating to the delivery of additional housing supply and contributing to the Waterloo South renewal project. This application for Stage 2 (Building 2D) seeks consent for the construction of approximately 94 dwellings.

3.1 Alignment with Strategic Plans

The Stage 2 (Building 2D) SSDA will facilitate development that is aligned with the relevant Region, District and local strategic plans. The proposal aligns with these plans as it will facilitate and support the delivery of increased residential development and complementary uses within an identified renewal site.

An evaluation against the relevant objectives of the Greater Sydney Region Plan, NSW Housing Strategy, and the Eastern City District Plan, as detailed in **Table 2**, demonstrates the significant strategic merit of the Stage 2 (Building 2D) SSDA in facilitating the renewal of Waterloo South.

Table 2 Strategic Merit Assessment Against the Region and District Plans

Strategic Plan	Strategic Context
National Housing Accord 2022	Australia is facing a significant and persistent housing supply challenge, with the cost of renting or purchasing a home now representing the largest living expense for most households. In response, the Australian Government's National Housing Accord (2023) commits to facilitating 1.2 million well-located homes between 2024 and 2029. The Accord places strong emphasis on delivering new dwellings in accessible, infrastructure-rich areas close to transport, services, employment and education. Despite being the most populous state, with the fastest population growth, the highest median rents and the highest median house prices, NSW continues to under-deliver on new housing relative to demand. Recent comparative analysis by the NSW Productivity Commission confirms that NSW lags behind other states in the number of completed homes, underscoring the urgency for well-located large-scale housing delivery. To support this national target, the NSW Government has introduced a suite of reforms designed to accelerate housing delivery, improve affordability and remove barriers to development in strategically important locations. The Stage 2 (Building 2D) SSDA directly advances the intent of the National Housing Accord by delivering high-density urban renewal in a central, transport-rich location, immediately adjacent to Waterloo metro station and within one of Sydney's most connected inner-city precincts. The proposed development provides: • Approximately 94 new dwellings, including ~49 seniors housing ILUs, significantly contributing to the supply of well-located homes within the approximate Accord's timeframe. • Consistent with the concept SSDA, the Stage 2 (Building 2D) SSDA will deliver a high-quality development comprising both social housing and ILUs, within a cohesive and inclusive neighbourhood. • An authentic mixed-use environment, co-locating housing with essential services, community infrastructure and high-frequency public transport. In combination, these outcomes demonstrate strong alignment with the national and state imperative to deliver more homes where people want and need to live.

Strategic Plan	Strategic Context
Housing 2041 – NSW Housing Strategy	Housing 2041 is the NSW Government's 20-year vision for the delivery of housing across the state. The strategy reiterates the Government's 20-year commitment to achieving secure, comfortable, diverse, affordable and resilient housing. Housing 2041 establishes four pillars which underpin the future of housing, and the proposed development is closely aligned with each of these pillars in the following manner: • Supply: the proposed development will unlock significant housing supply in an inner-city location that is well-connected to jobs, services, and transport infrastructure. The precinct is adjacent to the newly completed Waterloo metro station, providing high-frequency access to the Sydney CBD, Parramatta, and key employment centres. By facilitating increased density in a well-serviced area, the proposed development aligns with NSW Housing Strategy goals to optimise housing supply in strategic locations while avoiding urban sprawl. The Stage 2 (Building 2D) SSDA specifically will increase much needed supply of social housing in Greater Sydney. • Diversity: the Stage 2 (Building 2D) SSDA will be delivered as entirely social housing and will comprise one- and two- bedroom dwellings, with a quantity of units designed as ILUs. Detailed apartment design will consider the needs of different household types, including families, single-person households, and older residents. Accessible and adaptable housing will also be incorporated, ensuring that housing supply meets changing demographic and social needs over time. • Affordability: the Stage 2 (Building 2D) SSDA is part of the wider concept redevelopment which prioritises affordable and social housing, ensuring that lower-income households and vulnerable residents have access to secure accommodation. The Stage 2 (Building 2D) SSDA comprises social housing, seeking to provide 94 social housing dwellings, including 49 ILUs,, directly addressing affordability challenges in the City of Sydney,. • Resilience: The proposed development integrates climate-responsive design, sustainability initiatives, and resilient infrastructure to ensure long-term liveability. Buildings will incorporate energy-efficient materials, green infrastructure, and water-sensitive urban design principles to enhance sustainability. The project also prioritises public open spaces, walkability, and active transport connections, ensuring that the precinct remains adaptable and resilient to climate change impacts while supporting a healthy and connected community.
Greater Sydney Region Plan: A Metropolis of Three Cities	The Greater Sydney Region Plan is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. The Region Plan provides housing targets to inform the District Plans for a 0–5-year timeframe, as well as Council specific 6–10-year targets for LGAs. The 0-5 year housing target for the Eastern City was 46,550 and the strategic housing target is 157,5000. The proposed development is consistent with the following directions of the Greater Sydney Region Plan which will be further explored in the EIS: • Objective 1: Infrastructure supports the three cities • Objective 5: Benefits of growth realised by collaboration of governments, community and business - • Objective 6: Services and infrastructure meet communities' changing needs • Objective 7: Communities are healthy, resilient and socially connected • Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods • Objective 10: Greater housing supply • Objective 11: Housing is more diverse • Objective 12: Great places that bring people together • Objective 13: Environmental heritage is identified, conserved and enhanced • Objective 14: A Metropolis of Three Cities - integrated land use and transport creates walkable and 30-minute cities • Objective 30: Urban tree canopy cover is increased
Eastern City District Plan	The Eastern City District Plan underpins the Greater Sydney Region Plan and sets out the 20-year vision for the District through 'Planning Priorities' that are linked to the Region Plan. Under this plan, the suburb of Waterloo is identified as being adjacent to the strategic centre of Green Square and is mapped within the light rail investigation area. Since the publication of this plan, the Waterloo metro station which is part of the broader Sydenham to Tallawong route has been constructed and is now operational. The proposed development is consistent with the following priorities of the East District Plan which will be further explored in the EIS: • Planning Priority E3: Providing services and social infrastructure to meet people's changing needs • Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities • Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs services and public transport • Planning Priority E6: Creating and renewing great places and local centres and respecting the district's heritage • Planning Priority 18: Delivering high quality open space • Planning Priority E19: Reducing carbon emissions and managing energy, water and waste efficiently

Strategic Plan	Strategic Context
City of Sydney Local Strategic Planning Statement 2020	The Stage 2 (Building 2D) SSDA will enable a liveable, inclusive and connected city. The proposal aligns with the following principles of the City of Sydney LSPS which will be expanded upon in the EIS as follows: • Supporting community wellbeing with social infrastructure • A creative and socially connected city • Creating great places • New homes for a diverse community • Open, accountable and collaborative planning.
City of Sydney Local Housing Strategy 2021	The proposed development also gives effect to the City of Sydney Local Housing Strategy's core priorities for well-located, diverse and affordable housing supported by infrastructure. • Priority H1: Facilitating more homes in the right locations • Priority H2: Coordinating housing growth with the delivery of infrastructure • Priority H4: Increasing the diversity and number of homes available for lower-income households • Priority H5: Increasing the amount of social and supported housing • Priority H6: Improving NSW Government controlled site outcomes • Priority H7: Increasing liveability, sustainability and accessibility through high-quality residential design
NSW Net Zero Plan – Stage 1: 2020-2030	The Stage 2 (Building 2D) SSDA will facilitate development that consists of high-performance building designs that will meet both the BASIX and NABERS benchmarks and promote energy efficiency through embedded infrastructure and sustainability initiatives. Sustainability commitments will be detailed as part of the EIS.
State Infrastructure Strategy 2022-2042	The NSW Government's response to the State Infrastructure Strategy 2022–2042: Staying Ahead emphasises delivering “the right projects in the right place at the right time” and integrating infrastructure investment with land-use planning to support liveability, productivity and long-term growth. The Strategy recognises that access to “affordable and quality housing” is a key enabler of prosperous and thriving communities, and supports the delivery of secure, affordable and diverse housing. It also explicitly promotes planning outcomes that deliver more “housing, jobs, amenities and services” in locations where there is spare capacity in existing and planned infrastructure and calls for strategic land use plans to consider social and affordable housing in locations well-connected to key infrastructure, services and amenities. Consistent with these directions, the Stage 2 (Building 2D) SSDA will provide social housing in a location that is well-connected to key infrastructure, services and amenities. The redevelopment of Building 2D leverages investment in mass transit infrastructure and seeks to co-locate housing with services and amenities, including community facilities and open space.
Better Placed	<i>Better Placed</i> is a design policy that aims to improve the quality of the built environment. It promotes and supports better outcomes for places and spaces in response to the challenges faced in NSW including health, growth and urban renewal. Ultimately, the policy prioritises the community to ensure that all future development improves quality of life. The proposed development satisfies the key objectives, including: • Better fit • Better performance • Better for community • Better for people • Better working • Better value • Better look and feel The EIS will detail how the proposed redevelopment of Building 2D satisfies each of these key objectives.
Connecting with Country	The <i>Connecting with Country</i> framework is essential in maintaining and protecting Aboriginal heritage and uniting Aboriginal and non-Aboriginal people to work together in project development. In alignment with international and domestic laws and policies, the framework aims to remedy the continuous impacts of colonisation and provide a voice to Aboriginal people in development. The framework encourages reliance on local Aboriginal knowledge of Country to preserve and care for the land, along with supporting the local Aboriginal community. Community consultation with local Aboriginal people has informed the design of this proposed development, with key design elements incorporating and reflecting the local Aboriginal history, ecology and cultural values. Consistent with the concept SSDA, the Stage 2 (Building 2D) SSDA continues to be underpinned by a Connecting with Country framework. This framework will be further explored within the EIS. Furthermore, it will also support and inform the Designing with Country Framework which will form part of the Stage 2 (Building 2D) SSDA.

Strategic Plan	Strategic Context
Draft Sydney Plan	The draft Sydney Plan is the New South Wales Government’s strategic land-use plan for the Sydney region, designed to guide growth over the next 20 years. It sets the framework for how the region will manage population growth, housing supply, infrastructure investment, jobs, sustainability and liveability across 33 local government areas. The draft Sydney Plan is intended to replace the existing Greater Sydney Region Plan – A Metropolis of Three Cities (2018) and associated district plans once finalised. The draft Sydney Plan has developed the following priorities which will inform local strategic planning and assessment processes, infrastructure planning and prioritisation of public and private investment decisions. The Stage 2 (Building 2D) SSDA aligns with these priorities which will be further explored in the EIS: • Aboriginal outcomes • Housed • Prosperous • Connected • Resilient • Liveable • Coordinated

4.0 Project

4.1 Project Vision and Intended Outcomes

The vision for Waterloo South is to create a unique and vibrant mixed-tenure housing precinct that supports the needs of the community and delivers much needed housing in response to National and State Government priorities. Through consultation with Homes NSW, the holistic development of Waterloo South will:

- Provide high quality mixed tenure housing in the context of a rapidly transforming area.
- Contribute approximately 3,300 new dwellings, with 50 per cent of the residential GFA to be social and affordable housing.
- Provide for publicly accessible open space and public realm activation.
- Create an authentic mixed-use precinct, with housing co-located with essential services and access to public transport.

The Stage 2 (Building 2D) SSDA forms part of the overall Stage 2 development which includes both Blocks 2 and 4 (refer to **Figure 4**), in accordance with the proposed staging strategy. Specifically, on completion, Stage 2 will include:

- ~396 dwellings across Block 2 and Block 4, comprising approximately 193 social housing dwellings and 203 market dwellings.
- Retainment of locally heritage listed two-storey terrace houses.
- Dedication of community infrastructure, with a community space located in Building 4CB1 in addition to the delivery of a four-storey Council dedicated building for community facilities located on Block 2B.
- Delivery of a through-site link between George Street and West Street.
- Provision of non-residential uses in Block 4 on Level 1 of the three proposed Buildings.

4.2 Proposed Stage 2 (Building 2D) SSDA

The proposed SSDA will seek Crown development consent for the redevelopment of Building 2D as part of the second stage of the Waterloo South redevelopment.

Specifically, the objective of this proposal is to construct a single building with a height of eight-storeys and containing one basement level; accommodating approximately 94 dwellings for social housing uses (inclusive of ~49 seniors housing dwellings, in the form of ILUs). Excavation, remediation, public domain and landscaping works within, and surrounding Building 2D are also proposed as part of this application. These works align with the intended outcome of the Concept SSDA which is currently under assessment.

The Stage 2 (Building 2D) SSDA will seek Crown development consent for the following works within the boundary of Block 2D:

- Site preparation works including:
 - Bulk excavation and shoring.
 - Remediation of soils and dewatering.
 - Augmentation and/or extension of utility services as required
- Construction of approximately 94 social housing dwellings including ~49 ILUs across an eight (8) storey building. In addition to residential accommodation, the ground floor comprises the loading dock and a communal area and/or non-residential use.
- Construction of 1 x basement level to accommodate services, storage and car parking.
- Infrastructure, public domain and publicly accessible private open space:
 - Upgrades to the northern portion of John Street and improvements, widening and dedication for to the western extent of Cooper Street.
 - Site wide public domain interface works and improvements such as new footpaths.

These works encompass a part of the second stage of many in the redevelopment program for Waterloo South.

It is noted the following works are excluded from the scope of the Stage 2 (Building 2D) SSDA as they are captured by separate planning applications, as detailed in **Section 2.2.4**:

- Demolition of buildings and structures, tree removal and decommissioning of services (to be undertaken in a REF application to prepare the site for redevelopment). Note: While the bulk of these works will be addressed separately, some services decommissioning, augmentation and/or diversion may still be required under the Stage 2 (Building 2D) SSDA.
- The detailed fit-out and operation of any non-residential uses (if applicable).
- The installation of signage including but not limited to precinct wayfinding signage, building identification signage and the like.

A ground floor plan, typical floor plan for the proposal is illustrated at **Figure 10** and **Figure 10**. A proposed section plan is illustrated at **Figure 11**. The building design is currently underway, with the design team of FK and Kaunitz Yeung nominated as the co designers of Building 2D.

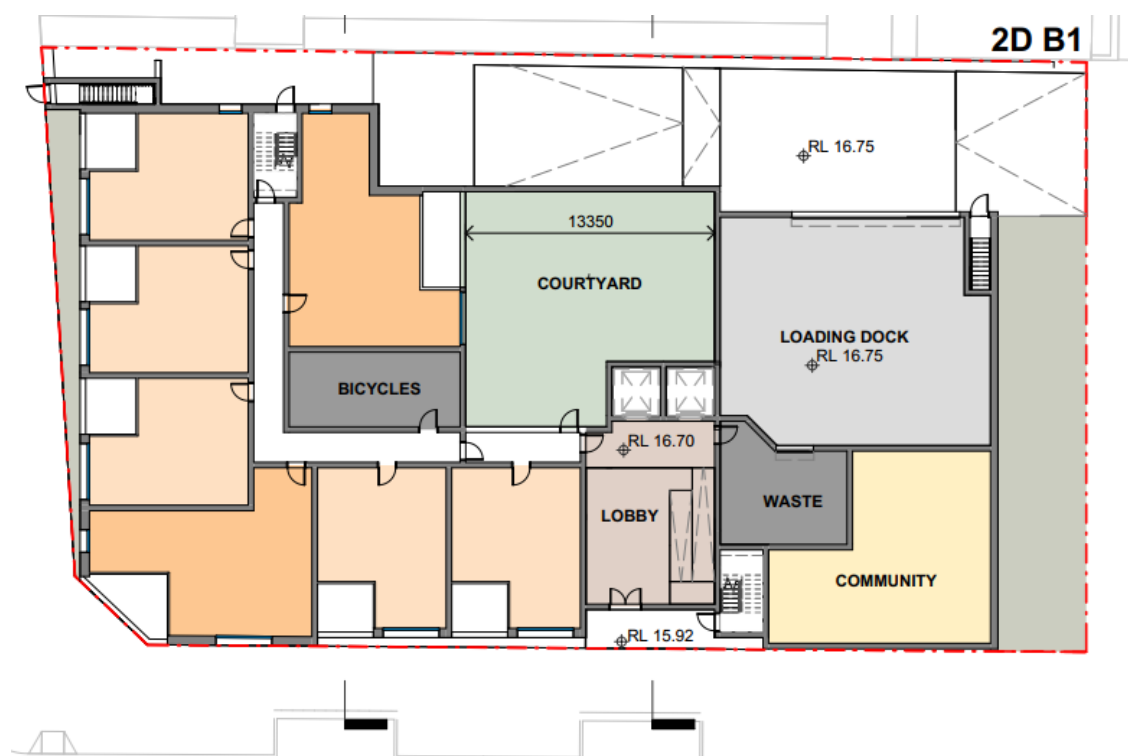


Figure 9 Building 2D Reference Scheme Ground Floor Plan

Source: Block Reference Schemes prepared by SJB

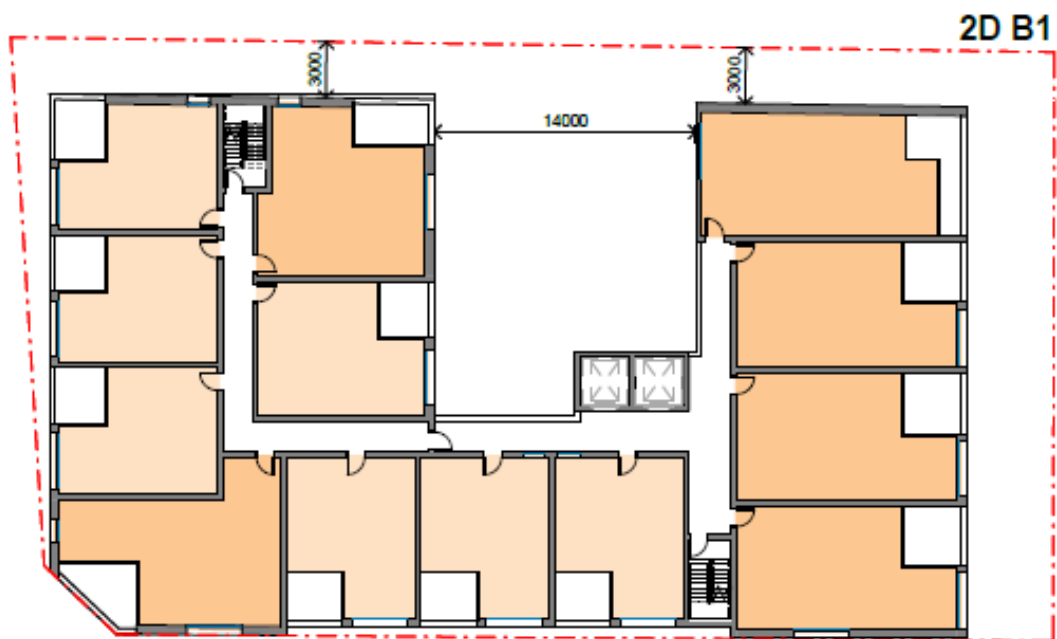


Figure 10 Building 2D Reference Scheme Typical Lower Plan

Source: Block Reference Schemes prepared by SJB

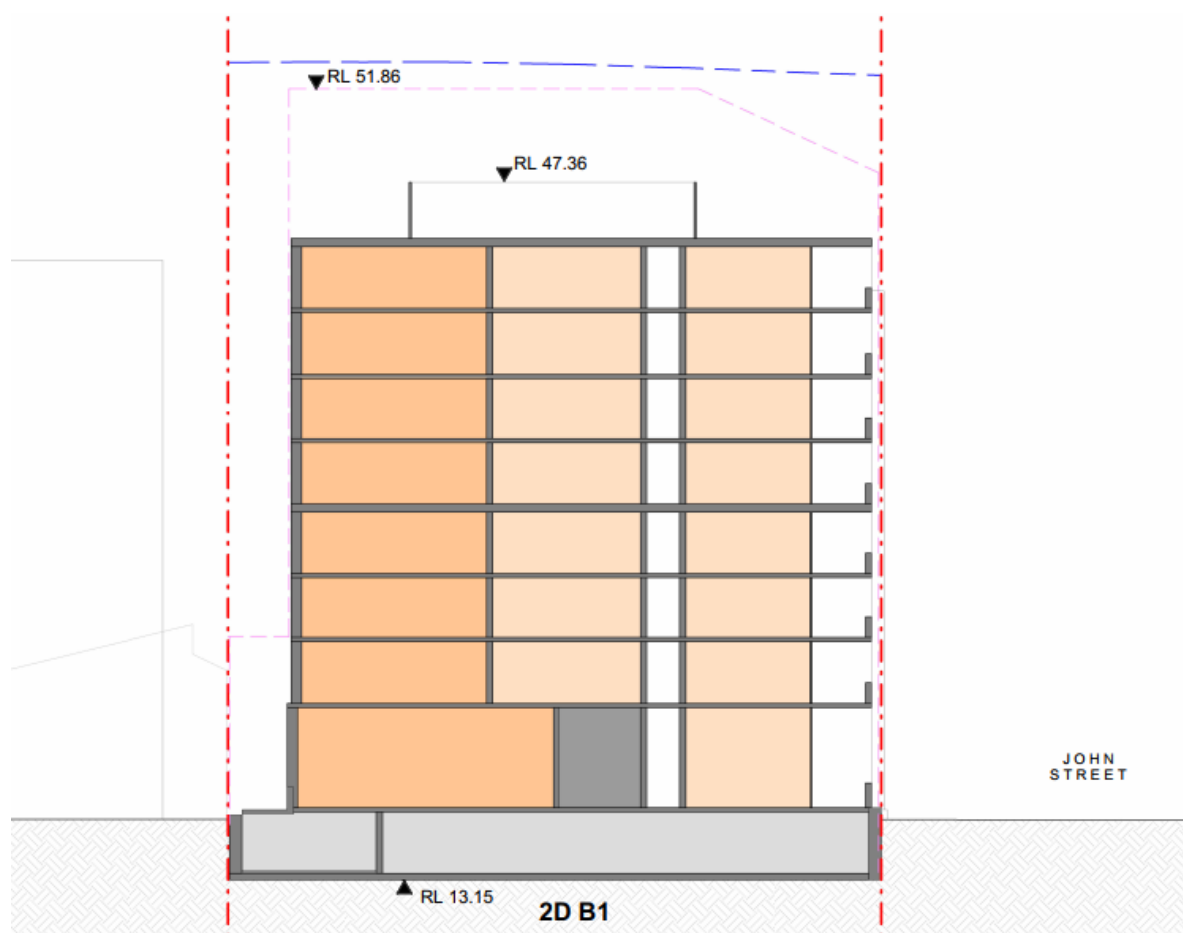


Figure 11 Proposed Section Plan

Source: Block Reference Schemes prepared by SJB

5.0 Statutory Context

This section provides an overview of the key statutory requirements for the project.

Table 4 Statutory Compliance Table

Matter	Comments
Power to Grant Consent	The broader Waterloo South Concept SSDA has been declared State Significant Development under section 26 of Schedule 1 to the <i>State Environmental Planning Policy (Planning Systems) 2021</i>. The Stage 2 (Building 2D) development will have an EDC exceeding \$30 million and will trigger the SSD pathway as per clause 26(1)(a), Schedule 1 of <i>State Environmental Planning Policy (Planning Systems) 2021</i>, independently of the above. The Minister for Planning and Public Spaces is the consent authority pursuant to Section 4.5(a) of the EP&A Act.
Crown Development	The proposed development is classified as Crown development under clause 294 of the <i>Environmental Planning and Assessment Regulation 2021</i> (EP&A Regulation). Clause 294 prescribes the following persons as the Crown for the purposes of section 4.32(2)(a) of the EP&A Act: • a public authority (other than a council), • an Australian university within the meaning of the Higher Education Act 2001, • a TAFE establishment within the meaning of the Technical and Further Education Commission Act 1990, and • a Crown cemetery operator within the meaning of the Cemeteries and Crematoria Act 2013. NSW Land and Housing Corporation is the applicant for the proposed development. LAHC forms part of the Department of Communities and Justice, which is a public service agency. Under section 1.4 of the EP&A Act, a public authority includes a public service agency. Accordingly, LAHC qualifies as a public authority for the purposes of the EP&A Act, and the proposed development constitutes Crown development. As a result, section 4.33 of the EP&A Act applies to the determination of the application. Section 4.33 provides that a consent authority (other than the Minister): • must not refuse consent to a Crown development application except with the approval of the Minister; and • must not impose conditions on its consent to a Crown development application except with the approval of the applicant or the Minister.
Permissibility	The proposal relates to land to which the Sydney LEP 2012 applies. The site is zoned MU1 Mixed Use. This zone permits a broad range of land uses that support mixed-use development. The land uses anticipated for the Stage 2 (Building 2D) redevelopment include: • residential accommodation which including seniors housing (ILUs) • community facilities; and/or • commercial premises
Other Approvals	Other Approvals may be sought in association with the Stage 2 (Building 2D) SSDA. • <i>Water Management Act 2000</i> – authorisation would be required if groundwater is to be impacted during construction. • <i>Sydney Water Act 1994</i> - Section 78 of the Sydney Water Act 1994 requires consent authorities to notify Sydney Water where an application for development could affect Sydney Water services. Accordingly, the applicant will consult with Sydney Water during the preparation of the EIS if deemed necessary. • <i>Biodiversity Conservation Act 2016</i> – A Biodiversity Development Assessment Report Waiver will be sought for the proposed development. • <i>Protection of the Environment Operations Act 1997</i> - The Protection of the Environment Operations Act 1997 (POEO Act) enforces licences and approvals formerly required under separate Acts relating to air, water and noise pollution, and waste management with a single integrated licence. Under Section 48 of the POEO Act, premise-based scheduled activities (as defined in Schedule 1 of the EP&A Act) require an Environment Protection Licence (EPL). Assessments carried as part of the EIS for the proposal would

Matter	Comments
	determine the need for an EPL. The general provisions of the POEO Act in relation to the control of pollution of the environment will apply throughout the development. During construction, appropriate management measures would be implemented in relation to the control of noise, dust, erosion and sedimentation, and stormwater discharge to ensure that the pollution control provisions of the POEO Act are satisfied. • <i>Heritage Act 1977</i> - An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i> may be required depending on the findings of the archaeological assessment. • <i>National Parks and Wildlife Act 1974</i> - An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i> will be required to the direct impact to Waterloo South PAD 01.
Pre-conditions to exercising the power to grant consent	• <i>Environment Protection and Biodiversity Conservation Act 1999</i> • <i>State Environmental Planning Policy (Biodiversity and Conversation) 2021</i> • <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> • <i>State Environmental Planning Policy (Housing) 2021</i> • <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
Mandatory matters for consideration	• <i>Environmental Planning and Assessment Act 1979</i> • <i>State Environmental Planning Policy (Biodiversity and Conversation) 2021</i> • <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> • <i>State Environmental Planning Policy (Industry and Employment) 2021</i> • <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> • <i>State Environmental Planning Policy (Sustainable Buildings) 2021</i> • <i>State Environmental Planning Policy (Housing) 2021</i> • <i>Environment Protection and Biodiversity Conservation Act 1999</i> • <i>Sydney Local Environmental Plan 2012</i>

6.0 Community Engagement

Given the planning history of the project, the community is aware of the proposed future development of the site, with various forms of consultation having been undertaken over several years. More recently, Homes NSW and Stockland have engaged with the local community, government agencies and statutory authorities in the preparation of the concept SSDA.

Engagement to support the Stage 2 (Building 2D) SSDA will build on the consultation undertaken to date and will focus on issues specifically relevant to the Building 2D proposal. This engagement will be carried out in accordance with the requirements of the SEARs. The applicant will also undertake further engagement to inform the EIS, consistent with the SEARs and the Department of Planning, Housing and Infrastructure's *Undertaking Engagement Guidelines for State Significant Projects (2021)*.

Consultation is anticipated with the following stakeholders:

- Local community, including:
 - existing social housing tenants and future residents of Waterloo South; and
 - residents living within and around the precinct.
- Community and human service providers
- Aboriginal stakeholders
- Government agencies and statutory authorities, including:
 - Department of Planning, Housing and Infrastructure
 - Transport for NSW
 - Sydney Metro
 - Sydney Trains
 - NSW Government Architect
 - City of Sydney Council
 - Department of Climate Change, Energy, the Environment and Water
 - NSW Environment Protection Authority
 - Heritage NSW
 - Crown Lands
 - Relevant service providers, including Ausgrid, Jemena and Sydney Water.

7.0 Proposed Assessment of Impacts

This Section identifies the matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

Table 3 Key matters for considerations in the Stage 2 (Building 2D) SSDA

Assessment Matter	Proposed Approach
Built Form & Urban Design	The proposed development will align with the building envelopes proposed under the Concept SSDA. The EIS will be supported by Architectural Plans and a Design Report outlining the nature of the proposed development and its consistency with the envelopes established by the Concept SSDA. The built form will also demonstrate consistency as relevant with the requirements of the Waterloo South (Estate) Design Guide and Sydney LEP 2012 (as proposed to be amended by the SARP) (refer to Section 2.2.1). The built form controls that will be assessed include but are not limited to, building height, FSR, setbacks, above ground-setbacks (where applicable to the northern boundary per the Concept SSDA Envelopes) and height in storeys.
Residential Amenity	The Stage (Building 2D) SSDA will address key residential amenity matters including but not limited to building separation and visual privacy, solar access, natural cross ventilation and communal open space. The assessment of building separation and visual privacy will relate to both the amenity achieved by Building 2D as well as the impacts of the proposal on the residential amenity of neighbouring properties. Key matters will be addressed within the Design Report. It will include an assessment against the applicable provisions of the Design Guide and the ADG. A Design Verification Statement will also be prepared by a Registered Architect and accompany the EIS.
Public Domain and Landscaping	Public Domain Plans will support the Stage 2 (Building 2D) SSDA to demonstrate that the proposed development comprises public domain works consistent with those proposed by the concept SSDA and in accordance with the relevant requirements of the VPA. Additionally, the SSDA will also be supported by Landscape Plans and a Landscape Design Report.
Overshadowing	Overshadowing will be assessed to understand the potential impacts of the proposed development on the surrounding public domain and neighbouring residential development. Shadow diagrams will be prepared and submitted with the EIS to assess of impacts to neighbouring properties including privately owned residential dwellings to the north and west, in addition to Block 8 to the south, and Block 3 to the east. The assessment will take into consideration the Concept SSDA, Waterloo (Estate) South Design Guide and the relevant components of the ADG.
Visual Impact	A Visual Impact Assessment will be prepared and submitted with the Stage 2 (Building 2D) SSDA which will build upon the assessment of visual impacts which forms part of the Concept SSDA. The assessment should demonstrate how the proposed development aligns with these concept envelopes and, accordingly, confirm that the development is consistent with the findings of the original report.
Bulk earthworks and excavation	The proposed site preparation and excavation works will align with the basement extent and building envelope proposed under the Concept SSDA. The EIS will be supported by civil and architectural plans defining the extent of earthworks, retention and shoring.
Contamination	An Overarching Remedial Action Plan (O-RAP) has been prepared by JBS&G Australia Pty Ltd to support the staged redevelopment of Waterloo South. The O-RAP confirms that contamination is present across the site at levels generally consistent with those encountered in historical urban renewal areas, and that contamination is largely confined to shallow fill materials. Identified contaminants include heavy metals, polycyclic aromatic hydrocarbons (PAHs), hydrocarbons and asbestos. Exceedances primarily relate to ecological assessment criteria and, to a lesser extent, human health criteria under certain land use scenarios. Groundwater impacts, including minor exceedances of metals and PFAS, were assessed as being consistent with regional background conditions within the Botany Sands aquifer, rather than the result of site-specific contaminating activities. The assessment concludes that groundwater contamination does not pose an unacceptable risk to human health or the environment, noting that groundwater use in the area is restricted and managed under the existing regulatory framework. A stage-specific Remediation Works Plan will be prepared as part of the Stage 2 (Building 2D) SSDA to ensure the land is made suitable for its intended use and that contamination-related risks to human

Assessment Matter	Proposed Approach
	health and the environment are appropriately managed in accordance with relevant NSW contaminated land legislation, guidelines and policy requirements.
Biodiversity	A Biodiversity Development Assessment Report (BDAR) waiver request will be prepared to support the Stage 2 (Building 2D) SSDA. This request will build upon the findings of the BDAR waiver request which supported the concept SSDA and confirm whether the findings of the waiver remain applicable and that biodiversity impacts associated with the development have been considered in accordance with the <i>Biodiversity Conservation Act 2016</i> and the Biodiversity Assessment Method 2020.
Tree Removal	One high value and two moderate value trees are located within the immediate vicinity of the subject site. Thus, a detailed Arboricultural Impact Assessment will be prepared to support the EIS identifying the number, location, condition and significance of trees to be removed and retained including: • Health of the trees, • Any existing canopy coverage to be retained on-site, • Tree root mapping if the proposal involves significant impacts to tree-protection zones of retained trees identified as being significant, • Trees to be removed. The tree removal strategy will be in accordance with the precinct-wide strategy established in the concept SSDA.
Infrastructure	A Utilities and Infrastructure Assessment will be prepared and submitted as part of the EIS. An Infrastructure and Staging Plan accompanies the concept SSDA which details the redevelopment of Building 2D can be accommodated within the existing infrastructure network with some localised upgrades. The Utilities and Infrastructure Assessment will build upon the plan that accommodated the concept SSDA and will identify the localised upgrades required to facilitate the development. It will also detail any protection of existing services required during construction.
Water Management	An Integrated Water Management Plan (IWMP) will be prepared which provides a framework for how water resources will be managed for the ongoing life of the development and during construction. The IWMP will: • Protect water quality and waterway health during disturbance • Ensure construction water use and discharge is managed legally and efficiently • Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater). • Demonstrate how the development complies with council's drainage requirements and identify proposed stormwater treatment and water quality management measures to minimise adverse environmental impacts. • Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards, the local council or other drainage or water authority.
Flood Risk Assessment	Flooding will be assessed in the EIS in to confirm that there will be no adverse impacts resulting from the proposed works. Building 2D is partially affected by shallow overland flow paths, with deeper ponding at the intersection of John and Cope Street. A Flood Impact Risk Assessment (FIRA) will be prepared which outlines the potential impacts of the proposed works to flooding conditions at the site. The FIRA will: • Identify the flood planning area and level as set out in the relevant EPI and other supporting documents. • Detail any flood risk management measures that are to be incorporated having regard to relevant guidelines (including any design solutions, flood modification measures or property modification measures). • Demonstrate consistency with the site wide Concept SSDA FIRA.
Geotechnical Conditions	A geotechnical report will be prepared and submitted with the Stage 2 (Building 2D) SSDA, as the proposal involves basement excavation and construction. The Geotechnical Assessment will build upon the information provided to support the concept SSDA and identify construction methodology that is suitable given the subsurface conditions of the site. A Groundwater Impact Assessment and a Dewatering Management Plan may be required if groundwater is likely to be intercepted in excavation works for the Stage 2 (Building 2D) SSDA.

Assessment Matter	Proposed Approach
Statement of Heritage Impact & Archaeological Assessment	A Heritage Impact Statement is to be prepared that assesses the proposal against the recommendations from the concept SSDA. Additionally, an Archaeological Assessment will be prepared which will extend upon the Historical Archaeological Assessment and assess the proposal against the recommendations of the concept SSDA. This is only required if areas outside the scope of the original assessment are identified.
First Nations Heritage	The AHIMS extensive search undertaken on the 22 August 2025 did not identify any Aboriginal sites at the site. Despite this, the Aboriginal Archaeological Technical Report that is appended to the ACHAR which supported the concept SSDA, requires further test excavation to be undertaken. This test excavation is to be undertaken following demolition of existing structures. Extending on the ACHAR submitted for the concept SSDA, the impact of the development on Aboriginal cultural heritage will be investigated and explored in detail and the report will: • Identify and assess the Aboriginal cultural heritage values within or near the site. • Document consultation with Aboriginal stakeholders • Evaluate the potential impact of the proposed development • Incorporate recommendations and strategies proposed within the ACHAR that supported the concept SSDA • Provide a strategy for ongoing protection, avoidance, or mitigation where impacts are anticipated • Support alignment with the NSW Aboriginal Cultural Heritage Consultation Requirements and the Connecting with Country Framework. This additional testing will inform the Archaeological Excavation Report and updated ACHAR. The below ground works required to facilitate the proposed basement for Building 2D are included within the Stage 2 (Building 2D) SSDA, in addition to ground disturbances to facilitate public domain works, access, basement structure and other ancillary works. As such, the EIS will be accompanied by a detailed level of assessment of potential impacts on historical and Aboriginal archaeology within the site.
Waste Management	A Construction and Demolition Waste Management Plan (Waste Management Plan) will be prepared and accompany the EIS. The Waste Management Plan will detail all likely waste streams to be generated during demolition and construction and outline proposed measures to dispose of the waste offsite. All demolition, construction waste will be reused or recycled where possible. An Operational Waste Management Plan is also to be prepared and submitted with the EIS. It will provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements and identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site. It will also demonstrate consistency with the Concept WMP submitted in support of the concept SSDA.
Noise and Vibration	A Noise and Vibration Impact Assessment will be prepared in accordance with the relevant NSW Environment Protection Authority (EPA) or other relevant industry guidelines and submitted as part of the EIS. The assessment will detail the operational and construction noise, and vibration impacts on nearby sensitive receivers and structures and will outline the proposed management and mitigation measures to be implemented. The assessment will also address the recommendations of the Noise Impact Assessment submitted in support of the Concept SSDA and address consistency with the Design Guide.
Transport Impacts	The Stage 2 (Building 2D) SSDA EIS will be supported by a Transport Impact Assessment (TIA), detailing the proposed traffic, parking and access arrangements on the site. It will assess the impacts of the proposed Building 2D development in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW. The Transport Impact Assessment will also need to be consistent with the requirements of the Design Guide, Sydney DCP 2012 and address consistency with the TIA submitted in support of the Concept SSDA.
Social Impacts	The social impacts of the proposed redevelopment of Waterloo South have been assessed as part of the Concept SSDA. In preparation of the Stage 2 (Building 2D) SSDA a social impact assessment will be prepared which extends upon the report prepared as part of the Concept SSDA. It will analyse the detailed design and include an analysis and assessment of the potential social and economic impacts of

Assessment Matter	Proposed Approach
	the proposed redevelopment of Building 2D. It will also address how recommended mitigation measures / enhancement strategies from the Concept SSDA have been implemented into the Stage 2 (Building 2D) SSDA.
Construction Impacts	A Preliminary Construction and Environmental Management Plan (CEMP) will be prepared and provided as part of the EIS. The CEMP will detail: • Timing of construction works to be undertaken; • Construction hours of operation and programme (including any staging); • Site establishment zone and temporary structures (e.g. site accommodation); • Plant and materials handling strategy; • Construction traffic and pedestrian, noise and vibration, soil erosion, air quality and dust control and stormwater management; • Environmental management strategies during construction; and • Waste management.
Other considerations	The following additional matters will be assessed as part of the EIS: • Building Code of Australia • Accessibility • Ecologically Sustainable Development • Public Art • Wind Impacts • Electrolysis Impacts (may be required)
Technical Reports	In summary, the EIS is also proposed to be supported by: • Survey Plan • Architectural Plans and Design Report • Design Verification Statement • Landscape Plans and Design Report • Public Domain Plans • Visual Impact Assessment • Estimated Development Cost (EDC) Report • Engagement Report • ESD Report & BASIX Assessment • Accessibility Design Compliance Report • Transport Impact Assessment • Construction and Environmental Management Plan • Noise and Vibration Impact Assessment • Integrated Water Management Plan • Flood Risk Assessment • Site-specific Remedial Works Plan (if required) • Geotechnical Report and Groundwater Impact Assessment/ Acid Sulphate Management Plan (if required) • Social Impact Assessment • Statement of Heritage Impact • Archaeological Assessment • Archaeological Excavation Report and updated ACHAR • Arboricultural Impact Assessment • Biodiversity Development Assessment Report Waiver Request • Waste Management Plan • Public Art Plan • Services and Utilities Report • Rail Interface Report (if required) • Electrolysis Assessment (if required)

Table 4 Matters of consideration not requiring further assessment

Assessment Matter	Proposed Approach
Bushfire	The site is not bushfire prone land; therefore, no further assessment is required.