



URBIS

Environmental Impact Statement

**Waterloo Metro Quarter
Over Station Development –
Central Precinct SSDA –
SSD-79307746**

Prepared for
WL DEVELOPER PTY LTD
6 November 2025

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Project Code	P0056227
Report Number	Final for Formal Lodgement – 06.11.2025



Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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CONTENTS

Acknowledgement of Country	1
EIS Declaration	7
Glossary and Abbreviations	9
Summary	12
The Site	12
Project Description	13
SSD Qualification and Permissibility	15
Community and Stakeholder Engagement	15
Justification of the Project	16
1. Introduction	17
1.1. Applicant Details	17
1.2. The Project	17
1.3. Project Objectives	18
1.4. Strategic Need	18
1.5. Project Background	19
1.5.1. Site History	19
1.5.2. Previous Approvals	19
1.5.3. Design Excellence Strategy	25
1.5.4. Related Development	26
2. Strategic Context	28
2.1. Key Features of Site and Locality	28
2.2. Other development in the area	32
2.3. Feasible Alternatives	33
2.4. Strategic Planning Alignment	35
2.5. Justification Summary	40
3. Project Description	42
3.1. Project Overview	42
3.2. Proposed land uses	43
3.2.1. Hours Of Operation	44
3.3. Built form and design	44
3.3.1. Materials and Finishes	46
3.4. Public Domain	49
3.5. Public Art	50
3.6. Elevated Outdoor Communal Areas	51
3.7. Parking	52
3.7.1. Car parking and vehicle access	52
3.7.2. Bicycle Parking	52
3.7.3. Loading and deliveries	52
3.8. Signage Zones	52
3.9. Subdivision	53
3.10. Construction Management	53
3.10.1. Staging	53
3.10.2. Construction Hours	53
4. Statutory Context	55
4.1. Statutory Requirements	55
4.1.1. Power to Grant Approval	55
4.1.2. Permissibility	56
4.1.3. Other Approvals	56
4.2. Pre-Conditions to Granting Consent	56
4.3. Mandatory Considerations	60
4.4. Contributions	65

4.4.1.	City of Sydney Development Contributions Plan 2015	65
4.4.2.	City of Sydney affordable housing program	65
4.4.3.	State Housing and Productivity Contribution	66
5.	Community Engagement	67
5.1.	Engagement Carried Out	67
5.2.	Community Views	67
5.3.	Engagement to be Carried Out	69
6.	Assessment of Impacts	70
6.1.	Design Quality	70
6.1.1.	Design Excellence and integrity	70
6.2.	Built Form and Urban Design	71
6.2.1.	Height, bulk and scale	72
6.2.2.	Podium and tower setbacks to northern precinct	75
6.2.3.	Public domain interface and creation of new publicly accessible areas	77
6.2.4.	Façade strategy	78
6.2.5.	Crime prevention through environmental design	81
6.3.	Co-living and Child Care Amenity	81
6.3.1.	Co-living accommodation	81
6.3.2.	Childcare	82
6.4.	Environmental Amenity	82
6.4.1.	Solar Access	82
6.4.2.	Overshadowing	83
6.4.3.	View loss and view sharing	86
6.4.4.	Wind Impacts	87
6.4.4.1.	Pedestrian safety	87
6.4.4.2.	Pedestrian comfort	88
6.5.	Visual impact	91
6.5.1.	Existing environment	91
6.5.2.	Potential Impacts	92
6.6.	Landscaping	100
6.7.	Traffic and Access	103
6.7.1.	Existing Environment	103
6.7.2.	Construction	104
6.7.3.	Operation	105
6.7.3.1.	Pedestrian Access and Movements	105
6.7.3.2.	Bicycle Parking	105
6.7.3.3.	Car Parking	106
6.7.3.4.	Traffic Generation and Road Network Impact	106
6.7.3.5.	Loading and Servicing	106
6.7.3.6.	Green Travel Plan	107
6.8.	Noise and vibration	107
6.8.1.	Existing Environment	108
6.8.2.	Potential Impacts	108
6.8.3.	Mitigation measures	110
6.9.	Flooding	110
6.9.1.	Existing Environment	110
6.9.2.	Potential Impacts	111
6.9.3.	Mitigation Measures	115
6.10.	Heritage Impact	115
6.10.1.	Existing environment	115
6.10.2.	Potential Impacts	116
6.11.	Social Impacts	116
6.11.1.	Existing environment	116
6.11.2.	Potential impacts	117
6.12.	Other impacts not requiring detailed assessment	117
7.	Justification of the Project	128
7.1.	Project Design	128

7.2.	Strategic Planning Consistency	128
7.3.	Statutory Planning Consistency	129
7.4.	Community Views	130
7.5.	Environmental Impacts	130
7.6.	Suitability of the Site	133
7.7.	Public Interest	133
8.	Conclusion	135
	Disclaimer	136
	Appendix A SEARS Requirements Table	
	Appendix B Updated Design Excellence Strategy	
	Appendix C Design Integrity Report	
	Appendix D Quantity Surveyor Report	
	Appendix E Architectural Plans	
	Appendix F Design Report	
	Appendix G Site Survey Plan	
	Appendix H BCA & DDA Assessment Report	
	Appendix I Pedestrian Wind Environment Report	
	Appendix J Overshadowing Report	
	Appendix K Solar Reflectivity Report	
	Appendix L Solar Access Report	
	Appendix N Visual Impact Assessment	
	Appendix O Landscape and Public Domain Plans and Report	
	Appendix P CPTED Report	
	Appendix Q ESD Report	
	Appendix R Transport, Traffic and Parking Impact Assessment; Green Travel Plan and Freight Service Management Plan	
	Appendix S Construction Traffic Management Plan	
	Appendix T Noise and Vibration Assessment Report	
	Appendix U Geotechnical Interpretive Report	
	Appendix V Water Management Plan	
	Appendix W Flood Impact Assessment Report	
	Appendix X Construction and Operational Waste Management Plan	
	Appendix Y Heritage Impact Assessment	
	Appendix Z Archaeological Assessment	
	Appendix AA Services and Utilities Infrastructure Report	
	Appendix BB Social Impact Assessment	
	Appendix CC Construction Environmental Management Plan	
	Appendix DD Engagement Report	
	Appendix EE BDAR Waiver	
	Appendix FF Security Risk Assessment	
	Appendix GG Structural Report	
	Appendix HH Subdivision Plans	
	Appendix II Statutory Compliance Table	
	Appendix JJ Mitigation Measures Table	
	Appendix KK Economic Impact Assessment	
	Appendix LL Consistency with the Concept Approval	
	Appendix MM Clause 4.6 Variation Request	
	Appendix NN Childcare Centre Assessment	

FIGURES

Figure 1 Site location plan	12
Figure 2 Location of the central precinct within the WMQ site	13
Figure 3 Artist impression of the central precinct viewed from Botany Road	14
Figure 4 Artist impression of the central precinct viewed from east of the site	15
Figure 5 Scope of public domain and ground plane works to be completed under the CSSI approval	21
Figure 6 Approved concept DA Building Envelope – Building 2 (Building E)	22

Figure 7 – Approved concept envelopes – original concept DA (2019) and first amending concept DA (2021).....	24
Figure 8 Local Context Map.....	28
Figure 9 Regional Context	29
Figure 10 Site and Locality Photographs.....	32
Figure 11 Proposal as viewed from Cope Street.....	45
Figure 12 Proposal as viewed from Botany Road	46
Figure 13 Podium material palette.....	47
Figure 14 Proposed tower materials - eastern elevation.....	48
Figure 15 Public domain and ground floor landscaping	49
Figure 16 WMQ Public Art Strategy	50
Figure 17 Proposed public art for Central Precinct	50
Figure 18 Level 3 terrace.....	51
Figure 19 Level 24 terrace.....	51
Figure 20 Level 3 terrace planting section.....	52
Figure 21 The built forms within the precinct (Building 2 outlined in red).....	73
Figure 22 Podium relationship with Waterloo Congregational Church.....	74
Figure 23 Relationship with Waterloo Congregational Church.....	74
Figure 24 Proposed podium and tower setbacks to north and south (plan).....	76
Figure 25 Proposed podium and tower setbacks to north and south (section)	76
Figure 26 Public Domain and the Creation of new publicly accessible areas (new public domain areas are shaded in blue)	78
Figure 27 Full height glazing to communal rooms.....	80
Figure 28 View of proposed Building 2 from east of the site	80
Figure 29 Shadow impacts to Alexandria Park - 09:00 at mid-winter	84
Figure 30 Shadow impacts to Alexandria Park - 10:00 at mid-winter	84
Figure 31 Shadow impact to Cope Street Plaza at mid-winter.....	85
Figure 32 Shadow analysis - Future Waterloo Park.....	86
Figure 33 Pedestrian wind safety conditions	87
Figure 34 Pedestrian wind safety conditions with the inclusion of mitigation measures and landscaping	88
Figure 35 Pedestrian Wind Comfort existing conditions.....	88
Figure 36 Pedestrian Wind Comfort proposed scenario (ground plane).....	89
Figure 37 Proposed pedestrian wind comfort conditions (with mitigation and landscaping).....	89
Figure 38 Above ground wind comfort conditions	90
Figure 39 Proposed above ground wind comfort conditions (with landscaping)	91
Figure 40 Viewpoints Assessed in Visual Impact Assessment	93
Figure 41 Deep Soil Provision - WMQ.....	101
Figure 42 Proposed tree planting	101
Figure 43 Proposed tree planting	102
Figure 44 Pedestrian diversion routes.....	105
Figure 45 Change in flood level - 1% AEP Flood Event.....	112
Figure 46 Change in flood level - PMF event.....	112
Figure 47 Change in flow velocity - 1% AEP flood event	113
Figure 48 Change in flow velocity - PMF event.....	114
Figure 49 Flood emergency response.....	115

PICTURES

Picture 1 Waterloo Congregational Church	32
Picture 2 southern precinct (under construction).....	32

Picture 3 View of Waterloo metro from Cope Street	32
Picture 4 Existing residential properties to the south of Wellington Street	32

TABLES

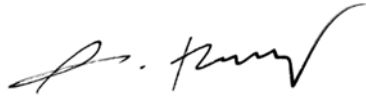
Table 1 Applicant Details	17
Table 2 Project Timeline	19
Table 3 Summary of modifications to SSD 9393	21
Table 4 List of Previous Approvals	26
Table 5 Site and Locality Description	29
Table 6 Nearby Projects / Development	32
Table 7 Project Alternatives	34
Table 8 Strategic Planning Consistency	35
Table 9 Project Summary	42
Table 10 Power to Grant Approval	55
Table 11 Permissibility	56
Table 12 Other Approvals	56
Table 13 Pre-Conditions	56
Table 14 Mandatory Consideration	61
Table 15 Overview of community engagement	68
Table 16 Key Appendices	70
Table 17 Design Response to SDRP 4 comments	71
Table 18 Mode share targets - employees	107
Table 19 Mode share targets - residents	107
Table 20 Standard Assessment Matters	118
Table 21 Statutory Planning Consistency	129
Table 22 Environmental Impact Summary	130

EIS Declaration

Project Details	
Project name	Waterloo Metro Quarter OSD – central precinct
Application number	SSD-79307746
Address	150 Cope Street, Waterloo
Applicant details	
Applicant name	WL Developer Pty Ltd
Applicant address	Level 28, 200 George Street, Sydney
Environment Impact Statement (EIS) prepared by	
Name and qualification	Peter Strudwick – Director Bachelor of Town Planning, UNSW
	Danielle Blakely – Associate Director Bachelor of Science - BS, Geography and Urban Planning, UNSW Master of Urban and Regional Planning, University of Sydney
	Anna Wang – Associate Director Bachelor of Planning, UNSW
	Michael Beale – Senior Consultant Master of Urban and Regional Planning (University of Westminster)
Declaration	
Name	Andrew Harvey
Registration number	73066
Organisation registered with	Planning Institute of Australia
The undersigned declares that this EIS:	
- has been prepared in accordance with Part 8 Division 5 of the <i>Environmental Planning and Assessment Regulation 2021</i>. - contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates. - does not contain information that is false or mis-leading; - addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project. - identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments. - has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>. - contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development. - contains a consolidated description of the project in a single chapter of the EIS;	

-
- contains an accurate summary of the findings of any community engagement; and
 - contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
-

Signature

A handwritten signature in black ink, appearing to read 'A. Harvey', with a large, sweeping checkmark-like flourish at the end.

Andrew Harvey – REAP no. 73066

30 October 2025

Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BC Reg	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
COPC	Contaminants of Potential Concern
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPA Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EIS	Environmental Impact Statement
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument

ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
OSD	Over Station Development
R&H SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
PAD	Potential Archaeological Deposit
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SDRP	State Design Review Panel
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Lot 2 DP 1274225
SSD	State significant development
SSDA	State Significant Development Application
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021

TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
WCM	Water Cycle Management
WMP	Waste Management Plan
WMQ	Waterloo Metro Quarter
WSUD	Water Sensitive Urban Design

Summary

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of WL Developer Pty Ltd (**WLD** or **the Applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development (SSD) Development Application (DA) for the detailed design of the Over Station Development (**OSD**) located within the central precinct of the Waterloo Metro Quarter (**WMQ**), at 150 Cope Street, Waterloo (**the site**).

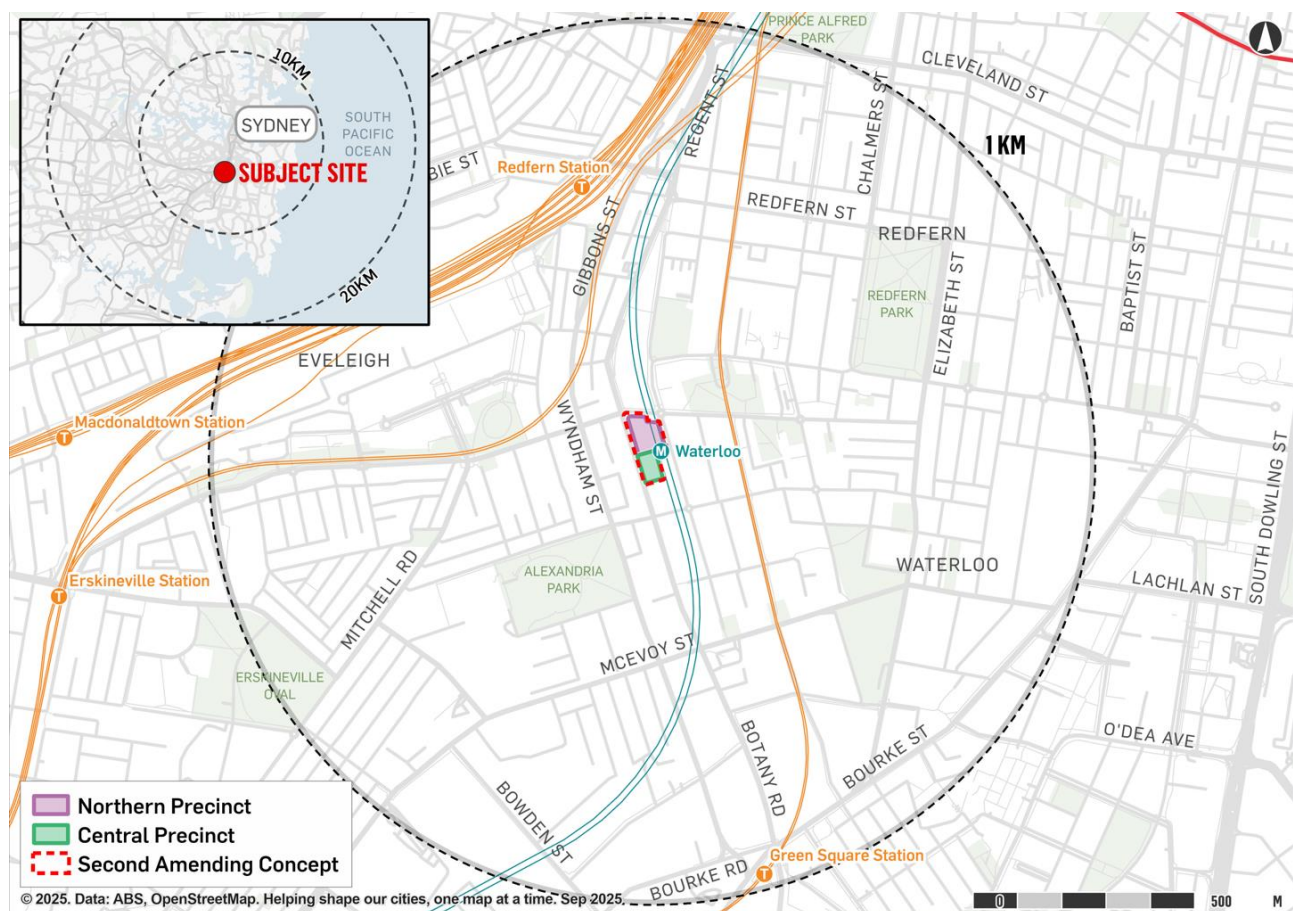
The SSDA seeks approval for the detailed design, construction and operation of a mixed-use development comprising a co-living tower atop a podium comprising retail, childcare and community uses to be constructed within the central precinct of the Waterloo Metro Quarter site, adjacent to the Sydney Metro Waterloo Station.

The proposed development has undergone an extensive design review process by the State Design Review Panel (SDRP) who provided detailed comments on the design of the proposed development and endorsed the application for lodgement.

The Site

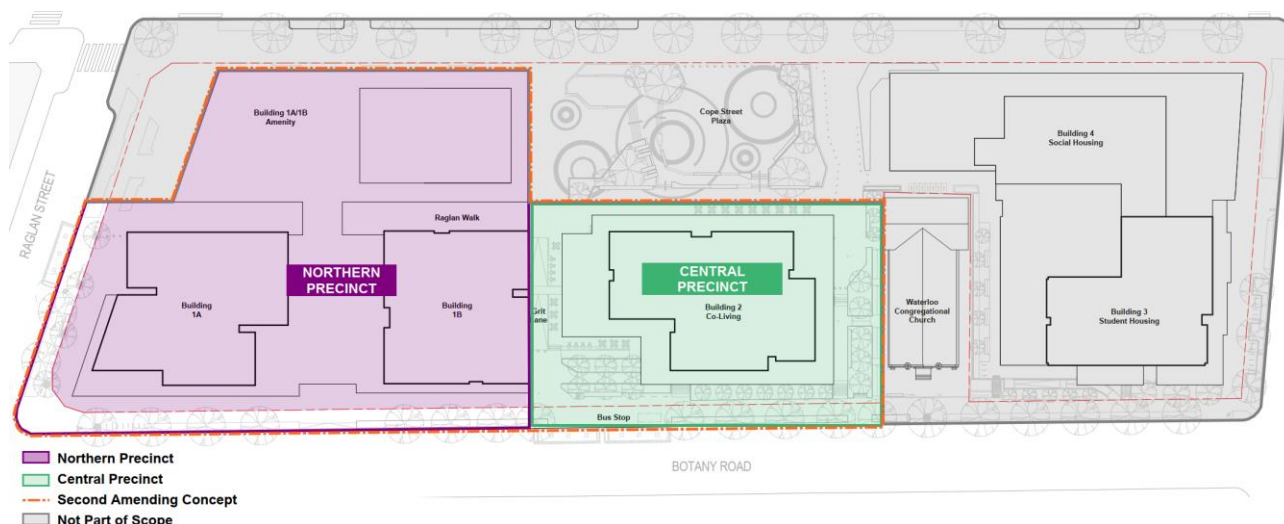
The site is located within the central precinct of the WMQ, which comprises land to the west of Cope Street, east of Botany Road, south of Raglan Street and north of Wellington Street. The WMQ is a rectangular shaped allotment with an overall area of approximately 1.287 hectares (**Figure 1**). The central precinct site is approximately 2,800 sqm and has frontage to the northern precinct to the north, Cope Street Plaza to the east, Waterloo Congregational Church to the south and Botany Road to the west (**Figure 2**).

Figure 1 Site location plan



Source: Urbis (2025)

Figure 2 Location of the central precinct within the WMQ site



Source: WL Developer

Project Description

This detailed SSDA seeks consent for the design, construction and operation of a 26 storey (including plant level) mixed use building within the central precinct (the site) of the WMQ site. The proposal comprises a co-living housing tower above a three storey podium containing retail and a community facility in the form of a childcare centre. Specifically, the proposal comprises:

- Ground level retail tenancies, community facility, and childcare, co-living and shared basement access lobbies
- Community centre in the form of a childcare centre at Level 1 and Level 2
- A Co-living housing tower from Levels 3 to 24 comprising:
 - Self-contained co-living accommodation rooms across 20 levels, with capacity of 500 units
 - Indoor and outdoor communal amenity at Levels 3 and 24
 - Communal space also provided on each accommodation level;
- Ground level vehicular access from Church Square shared zone to the shared basement
- Creation of a pedestrian thoroughfare that connects with Cope Street Plaza, creation of Grit Square fronting Botany Road, landscaping and public domain works.
- Indicative building signage zones

Figure 3 Artist impression of the central precinct viewed from Botany Road



Source: Bates Smart (2025)

Figure 4 Artist impression of the central precinct viewed from east of the site



Source: Bates Smart (2025)

SSD Qualification and Permissibility

The proposed development qualifies as State Significant Development (**SSD**) in accordance with Clause 19(2)(a) of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* as it is development associated with railway infrastructure that has an Estimated Development Cost (**EDC**) of more than \$30 million.

The site is zoned MU1 Mixed Use in accordance with the Sydney LEP 2012 and the proposed retail, community and co-living uses on the site are permissible with consent in the MU1 zone.

Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by Ethos Urban and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants; and
- Government agencies and utility stakeholders.

This engagement was consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects*. The feedback received has been incorporated into the design and assessment in the EIS.

In accordance with the EPA Regulation, the EIS will be placed on formal public exhibition. Following this exhibition period, the Applicant will respond to any matters raised by notified parties.

Justification of the Project

The EIS has assessed the project against the requirements of the Secretary's Environmental Assessment Requirements (**SEARs**) issued by DPHI attached in **Appendix A**, and the relevant planning instruments and policies (**Appendix II**).

The proposal is consistent with the strategic and statutory planning framework for the site, and is fully compliant with the density, land use and height requirements for the site as set out in the Sydney LEP 2012 and second amending concept DA. It delivers an integrated land use and public transport outcome by providing 500 co-living accommodation rooms, retail, childcare and community uses adjacent to the new Waterloo metro station, consistent with the objectives of transit-oriented development.

The built form has been carefully designed to minimise impacts, with no unacceptable overshadowing of surrounding properties or public open spaces, and compliance with the Waterloo Design and Amenity Guideline. The proposal enhances the public domain through generous landscaped pedestrian connections, activated by ground floor retail, and high quality communal open spaces. The design has been reviewed and endorsed by the SDRP, demonstrating design excellence through considered design elements, the use of durable materials, sensitive integration with the surrounding heritage context, and a cohesive architectural expression that reinforces Waterloo's industrial character.

The development also promotes sustainable transport outcomes by limiting car parking, encouraging public and active transport use, and incorporating best-practice sustainability measures, including ESD initiatives, energy efficiency and water-sensitive urban design. The proposal will generate substantial public and economic benefits, including new housing supply in an accessible location, hundreds of construction and operational jobs, and significant value uplift to the NSW economy. On this basis, the proposal represents an orderly, sustainable and highly suitable use of the site in the public interest and is recommended for approval.

In view of the above, it is considered that this SSDA has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. Introduction

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of WL Developer Pty Ltd (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development (SSD) Development Application (**DA**) for the detailed design of the Over Station Development (**OSD**) located within the Central Precinct of the Waterloo Metro Quarter (**WMQ**), at 150 Cope Street, Waterloo (**the site**).

The site is located on Gadigal Country and we acknowledge the Gadigal people, their elders past and present, and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

1.1. Applicant Details

The applicant details for the proposed development are listed in the table below.

Table 1 Applicant Details

Proponent	WL Developer Pty Ltd
Postal Address	Level 28, 200 George Street, Sydney
ACN	637 792 888
Nominated Contact	Daniel Doyle

1.2. The Project

This application seeks consent for the design, construction and operation of a 26 storey (including plant level) mixed use building within the central precinct (the site) of the WMQ site. The proposal comprises a co-living housing tower above a three storey podium containing retail and community facility in the form of a childcare centre. Specifically, the proposal comprises:

- Ground level retail tenancies, community facility, and childcare, co-living and shared basement access lobbies
- Community centre in the form of a childcare centre at Level 1 and Level 2
- A Co-living housing tower from Levels 3 to 24 comprising:
 - Self-contained co-living accommodation rooms across 20 levels, with capacity of 500 units
 - Indoor and outdoor communal amenity at Levels 3 and 24
 - Communal space also provided on each accommodation level;
- Ground level vehicular access from Church Square shared zone to the shared basement
- Creation of a pedestrian thoroughfare that connects with Cope Street Plaza, creation of Grit Square fronting Botany Road, landscaping and public domain works.
- Indicative building signage zones

The application is submitted for concurrent assessment with a DA to amend the Waterloo Metro OSD concept DA (SSD 9393) (**the concept DA**). As the Concept DA has previously been amended by an amending concept DA (SSD 10441), the concurrent amending DA is referred to as the **second amending concept DA**.

The second amending concept DA (SSD-79307765) seeks consent to modify the existing concept approval as it relates to the northern and central precincts, by amending the building envelopes to redistribute floor space to suit a new mix of land uses. In doing so, this application will establish a new planning framework as the basis for which the detailed design of the future built form will be assessed against within the relevant detailed SSDA. This detailed SSDA will be consistent with the building envelope proposed under the second

amending concept DA and will replace the previous detailed approval applying to the Central Precinct (SSD 10439).

1.3. Project Objectives

The objectives of the proposed development are to:

- Provide co-living housing in an accessible location with amenities and public transport infrastructure in close proximity to the site to support the NSW Government's direction to increase housing diversity to accommodate the State's growing population.
- Provide a high-quality living environment for future tenants.
- Provide community facility in the form of a childcare centre operated by a non-profit community organisation to service both the local community and the incoming residents and workers.
- Activated ground plane which integrates with Cope Street Plaza to the east, Grit Lane to the north and Church Square to the south. This is achieved by activated retail opportunities and community uses accessed via a thriving public domain space connecting the public and private realms.
- Creation of a new public plaza – Grit Square, which will provide an integrated public space for Metro commuters and the bus stop fronting Botany Road.
- Achieve a high-quality built form that respects the local character of the area and positively contributes to the streetscape.
- Respect the curtilage of Waterloo Congregational Church and enhance the church's visual presence in the public domain.
- Create a building that is part of a fully integrated transport system.
- Provide an articulated built form that is consistent with the concept DA (as amended).

1.4. Strategic Need

In December 2019, development consent was granted for a Concept Development Application (SSD 9393) for three residential towers above a three storey non-residential podium, and three mid rise buildings above podium level above the Waterloo metro station at the WMQ. The approval also approved for conceptual land use for non-residential (retail, office and business premise), community and residential floor space, including 70 social housing dwellings.

Following Sydney Metro's appointment of WL Developer Pty Ltd as the preferred partner to deliver the Waterloo Metro Quarter OSD, and ongoing design development, modifications were required to the Concept approval to accommodate the proposed detailed design of each of the precincts. As a result, in June 2021, the Applicant was granted consent for an Amended Concept DA (SSD 10441) which modified the approved building envelopes for the northern precinct (previously comprising 'Building A', 'Building B', 'Building C' and 'Building D' under SSD 9393), as well as a minor amendment to the central precinct 'Building E' (now referred to as Building 2) building podium envelope. The amended Concept DA also enabled a new commercial building (with additional commercial office GFA) to be pursued within the northern precinct, in replacement of four building envelopes approved under SSD 9393, which comprised one residential tower, and three mid-rise residential buildings.

In mid-late 2021 and in accordance with the amended concept approval, the Applicant was granted consent for detailed SSDAs for residential, commercial and student housing buildings in the central, northern and southern precincts respectively.

Following the COVID-19 pandemic there has been a fundamental shift in the demand for office space. While the core Sydney CBD office market has showed resilience, there has been a considerable decline in demand for city fringe office space. Despite active marketing of the project since 2020 there has been minimal tenant interest. Accordingly, the previously approved 34,000 sqm of office space is unviable within the current market conditions.

The shift in commercial market and the lack of demand for office space across Sydney warranted the repositioning of the site, especially for the northern precinct to optimise the potential of this well located site.

In late 2023, the NSW Premier identified housing as the NSW Government's top priority, and a range of initiatives were unveiled to assist the delivery of increased housing supply in well located areas, such as the subject site, that is close to transport, jobs and existing infrastructure.

In addition, the National Housing Accords set an ambitious target for 1.2 million new well-located homes across Australia in the five years between June 2024 to June 2029. The NSW share of these targets is to deliver 377,000 new well-located homes. Specifically for City of Sydney LGA, based on firm supply estimates, forecasts suggest a shortfall of almost 4,900 units by FY2029 (when comparing to the LGA target), highlighting an urgent need for policy and market responses to address both structural and emerging housing constraints.

More specifically for co-living, it is an emerging sector that is likely to continue to grow in the short-term. This is supported by relative affordability for tenants, and meeting the needs of the growing population of lone and couple person households. More importantly, it is a diverse type of accommodation in a high amenity location, and is able to provide a transition for graduating students and has flexibility to help meet overflow.

As a result of the decreased demand in commercial office space and the increased need of residential housing and diverse economisation, a change of use for the northern precinct (from commercial to residential) and Central Precinct (from residential to co-living housing) is warranted. This application and the northern precinct Detailed SSD will provide much needed market housing, affordable housing and co-living housing, along with community and commercial uses, adjacent to the new Waterloo metro station.

WMQ OSD, including the shared basement below the northern and central precincts, has commenced excavation and construction and is well positioned to deliver additional housing supply and diversity in the short to medium term to assist the lack of supply in the local and broader market.

1.5. Project Background

1.5.1. Site History

A timeline of the project is provided in the table below.

Table 2 Project Timeline

Relevant Matter	Date
Concept Development Application (SSD 9393) approved for three residential towers and four mid-rise commercial towers above a three-to-four storey podium at the Waterloo Metro Quarter.	December 2019
Amended Concept Development Application (SSD 10441) approved for an amended building envelope and use at the northern precinct to enable the development of a commercial building and amended the podium level of the central precinct building envelope.	June 2021
Detailed SSDAs approved for residential, commercial and student housing buildings in the central, northern and southern precincts in accordance with the Concept Approval (as amended).	July-November 2021
The Federal Government announced the National Housing Accord which committed to delivering 1.2 million homes in well-located areas in 5 years starting from July 2024.	October 2022
SEARs issued for a second amending concept development application for the WMQ and new detailed SSDA applications for the central and northern precincts.	February 2025

1.5.2. Previous Approvals

Sydney Metro

Sydney Metro is Australia's biggest public transport project. Services commenced in May 2019 on the city's Metro Northwest line, with a train running every four minutes in the peak between Tallawong and Chatswood. By the end of 2025, Sydney will have 31 metro railway stations, and construction will be advanced on two new lines, Western Sydney Airport and West Metro lines.

Waterloo metro station is located on the Sydney Metro City & Southwest line, which provides a new 30km line extending seamlessly from the end of Metro Northwest at Chatswood, through North Sydney and the CBD, and southwest to Bankstown.

The line is opening in two stages. In August 2024, new metro stations opened at Crows Nest, Victoria Cross, Barangaroo, Martin Place, Gadigal, Waterloo and new underground metro platforms at Central Station, and upgraded facilities were completed at Sydenham. In October 2024, work commenced on the upgrade and conversion of the remaining 10 stations between Sydenham and Bankstown to Sydney Metro standards, with services due to commence in 2026.

The Sydney Metro City & Southwest - Chatswood to Sydenham project was approved in 2017 by the Minister for Planning in 2017 as a critical State Significant Infrastructure project (reference SSI 15_7400) (CSSI Approval). The terms of the CSSI Approval includes all works required to construct the Sydney Metro Waterloo Station, including the demolition of existing buildings and structures.

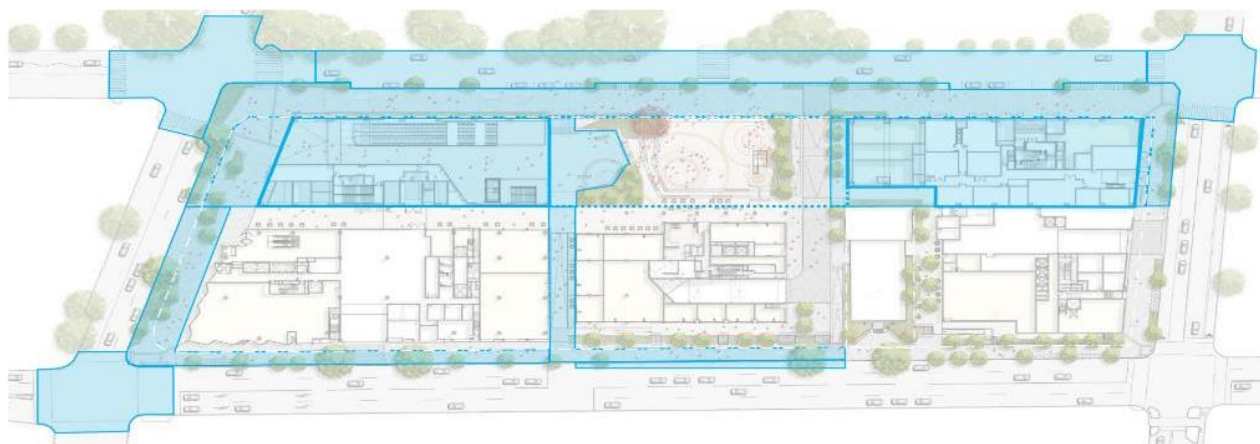
The CSSI Approval also includes construction of below and above ground structures associated with the Metro Station and structures required to facilitate the construction of OSD such as structural and service elements, and space provisioning.

At Waterloo, the CSSI approval also included a significant component of public domain improvements on and adjacent to the WMQ site, with the remainder to be delivered by the OSD developer. The areas that are shaded in blue in the figure below are public domain areas that are being delivered under the CSSI and do not form part of the Detailed SSD applications.

A summary of works that is being delivered under the CSSI is provided below:

- Demolition of existing development.
- Excavation and remediation of the station box site undertaken in line with a Remediation Action Plan and Earthworks Management Plan.
- Design and construction of station box including primary station works, structural works (base build), retail/commercial tenancies, structural and service provision for the OSD (e.g. structure, lift cores and mechanical services).
- Design and construction of station services box, including primary station works, structural works (base build), retail/commercial tenancies, structural and service provision for the OSD (e.g. structure, lift cores and mechanical services).
- Station structure including the concourse and platforms
- Retail spaces within the station building
- Public domain, including Grit Lane.
- Access arrangements including vertical transport such as escalators and lifts
- Structural and service elements and relevant space provisioning necessary for constructing the OSD, such as columns and beams, space for lift cores, plant rooms, access, parking, retail and building services

Figure 5 Scope of public domain and ground plane works to be completed under the CSSI approval



Source: Applicant

Original concept DA – SSD 9393

Development consent was granted on 10 December 2019 for the Concept Development Application (SSD 9393) for Waterloo Over Station Development including:

- A maximum building envelope for podium, mid-rise and tower buildings.
- A maximum gross floor area of 68,750sqm, excluding station floor space.
- Conceptual land use for non-residential and residential floor space.
- Minimum 12,000sqm of non-residential gross floor area including a minimum of 2,000sqm of community facilities.
- Minimum 5% residential gross floor area as affordable housing dwellings.
- 70 social housing dwellings.
- Basement car parking, motorcycle parking, bicycle parking, and service vehicle spaces.

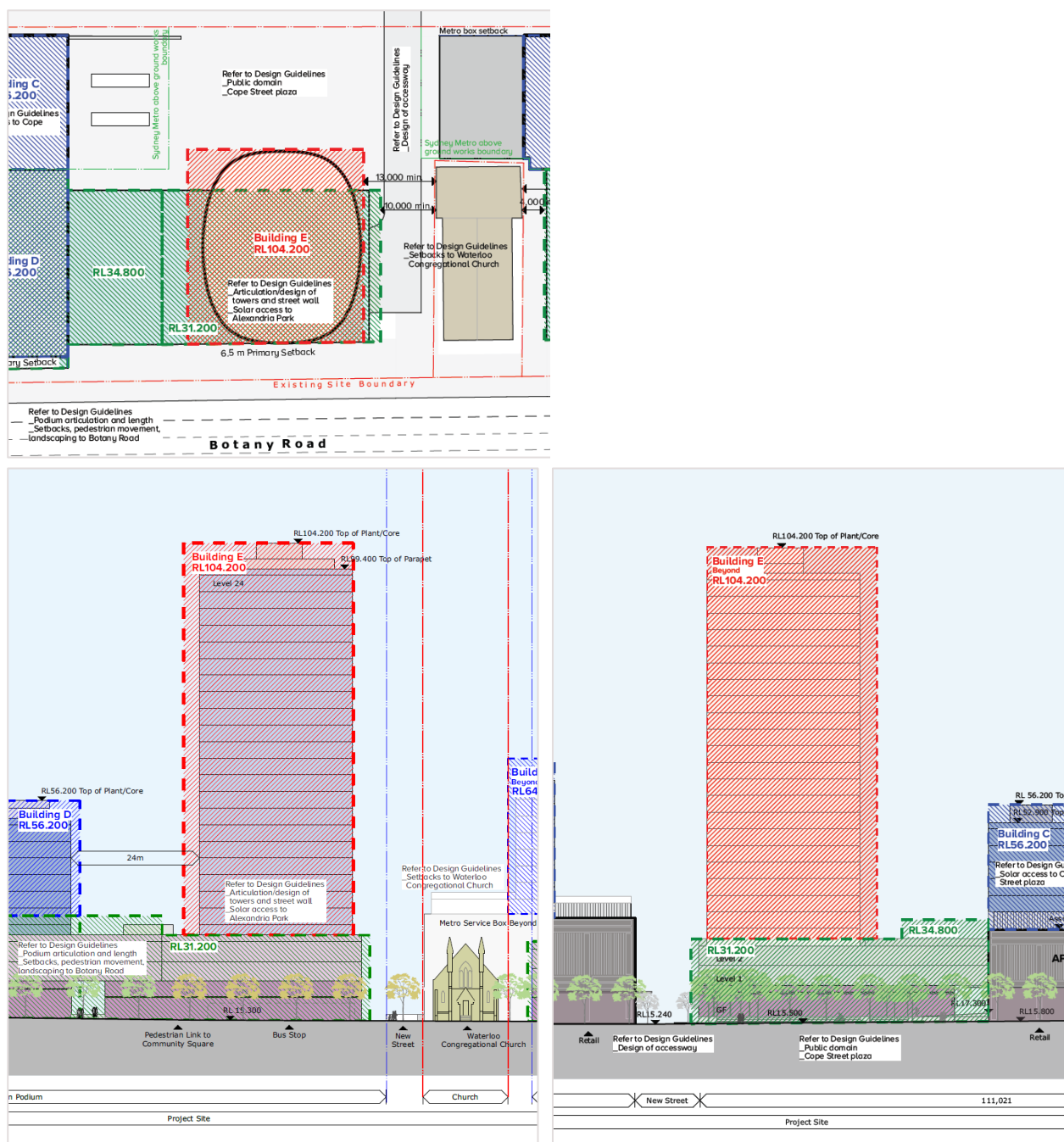
SSD-9393 has been modified on four occasions, as summarised in the table below.

Table 3 Summary of modifications to SSD 9393

MOD Number	Description	Date of issue
SSD 9393-Mod-1	Changes to southern precinct podium use and rooftop protrusions	30/07/21
SSD 9393-Mod-2	Staging of Condition A12 regarding public benefits	01/06/21
SSD 9393-Mod-3	Changes to car parking and bike parking conditions	26/08/21
SSD 9393-Mod-4	Envelope change for protrusion for rooftop plant above southern precinct social housing Building 4	03/10/23

The concept DA instrument of approval does not consent to any physical works commencing on site. The approved concept for the SSDA building envelope in relation to this DA is shown in the figure below.

Figure 6 Approved concept DA Building Envelope – Building 2 (Building E)



Botany Road Elevation

Source: Turner

Cope Street Elevation

The Development Consent for application SSD 9393 included two components. 'Part A' related to the terms of the consent, whilst 'Part B' included the conditions to be satisfied in future detailed development application(s).

First amending concept DA – SSD 10441

Development consent was granted on 17 June 2021 to amend the building envelope of the Northern Precinct and the podium envelope of the central precinct approved under SSD 9393. The first amending concept DA (SSD 10441) also amended the land use of the northern precinct from residential and commercial to just commercial use.

Specifically, the first amending concept DA modified the approved building envelope for the Northern Precinct (previously comprising 'Building A', 'Building B', 'Building C' and 'Building D' under SSD 9393), as well as a minor amendment to Building 2, through:

- Increasing the maximum building height for the southern portion of the northern precinct building envelope and removing the tower component from the northern portion of the envelope to enable the redistribution of floor space to commercial office floor plates.
- Increasing the amount of non-residential floorspace within the northern precinct from between 12,000m² and 20,000m² to 34,715m² with a consequential reduction in residential floorspace, with no change to the maximum GFA on the overall site (68,750sqm).
- Amending the podium design of the central precinct to accommodate increased community GFA.

Amendments to SSD 9393 arising from the first amending concept approval resulted in limited changes to the approval, namely:

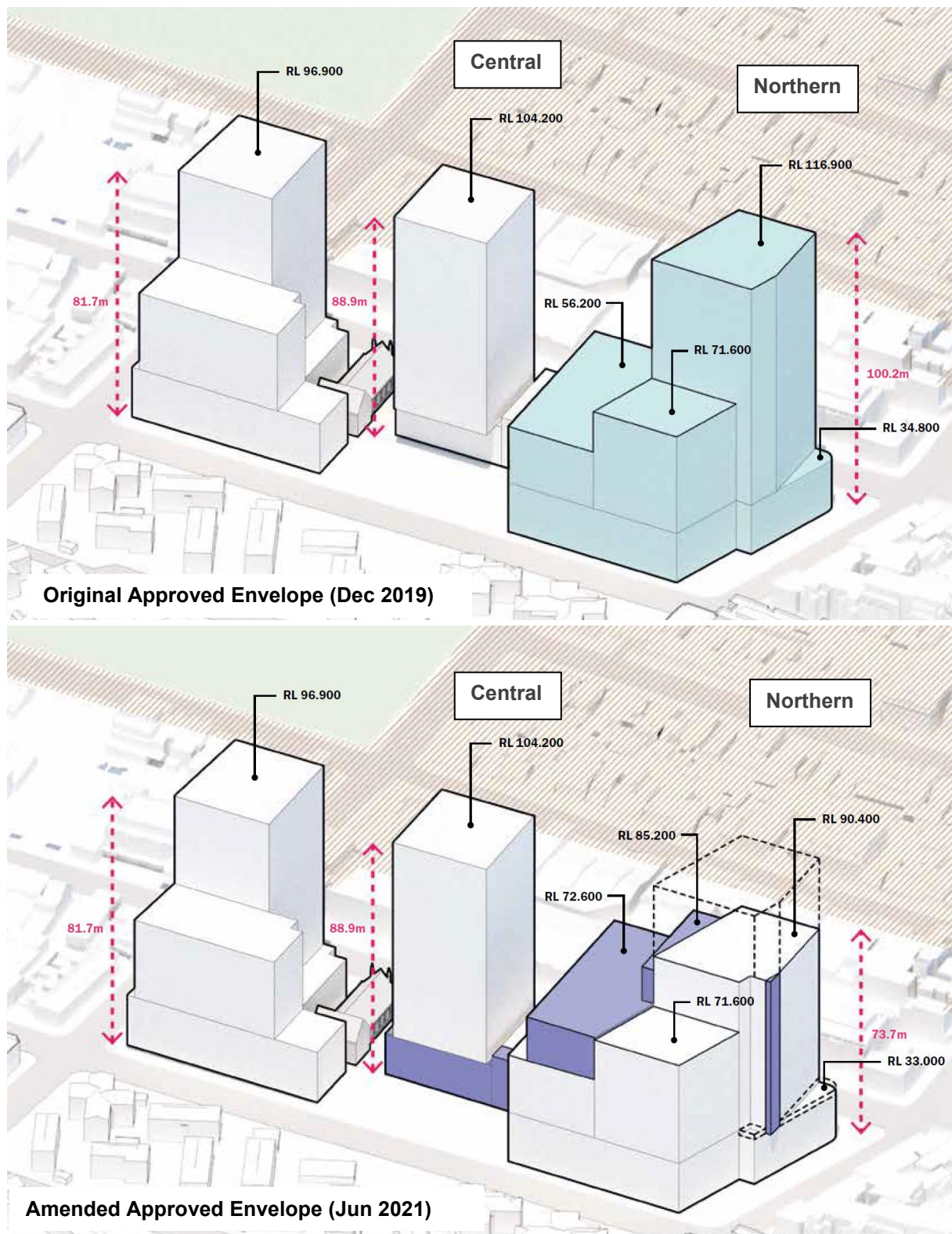
- Reference to an updated set of Concept building envelope drawings
- An expanded description of development as follows:

Conceptual land use for non-residential and residential floor space, including but not limited to office premises, student housing, social housing, retail premises, business premises and residential flat buildings.

- Consequential and clarifying condition amendments.

A comparison of the original and approved amended concept envelopes is provided below.

Figure 7 – Approved concept envelopes – original concept DA (2019) and first amending concept DA (2021)



Source: Hassell, 2020

Relationship between the original concept DA and first amending concept DA

The first amending concept DA consent resulted in the modification of the consent to concept DA SSD 9393, to incorporate all changes approved under the first amending concept approval. SSD 9393 was thus amended to reference the revised site-wide Building Envelope diagrams, an expanded list of land uses, reference all approved documentation, and consequential amendments to conditions.

The consolidated consent to SSD 9393 now contains all conditions of concept approval, including the amendments under SSD 10441. Concept DA SSD 9393 is therefore the applicable development consent against which detailed SSD applications must demonstrate consistency in accordance with section 4.24 of the EP&A Act.

Appendix LL provides assessment of the conditions to be satisfied as identified under Part B of the consolidated consent of Concept Development (including amending concept SSD) and how they relate to and/or are addressed within this EIS as part of this detailed SSDA.

Second amending concept DA – SSD-79307765

A second amending concept DA has been lodged concurrently with this DA in accordance with Section 4.22 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. It seeks consent for amended building envelopes, replace commercial floor space with residential floor space within the northern precinct and replace market residential floor space with co-living floor space within the central precinct of the WMQ site approved under SSD 9393 (as amended by SSD 10441).

Specifically, the second amending concept DA seeks the following:

- Northern precinct: Change the approved building envelope, building height and concept land use for the northern precinct by replacing the 17-storey commercial office building envelope with a revised envelope for 2 residential apartment towers above a non-residential podium. The residential towers will include market housing and contribute to the provision of a minimum of 5% affordable housing.
- Central precinct: Change the approved building envelope and conceptual land use for the Central Precinct by replacing the residential apartment tower (to contain market and affordable housing) with a co-living housing development, still above a non-residential podium, which includes community facilities and childcare.

The second amending concept DA has been submitted concurrently with this proposal and is therefore the relevant concept approval for this application.

This detailed SSDA is consistent with the concept DA, as proposed to be amended.

1.5.3. Design Excellence Strategy

The concept DA exercised the discretion available under clause 6.21(6) of *Sydney Local Environmental Plan 2012 (SLEP)* to waive the requirement for a competitive design excellence process under clause 6.21(5), as the concept design has been subject to the Sydney Metro Waterloo Design Excellence Strategy, endorsed as part of the original Concept DA.

The Design Excellence Strategy and the Waterloo Design and Amenity Guideline for the Waterloo Station OSD were established to guide the detailed design of the future OSD and ensure a high quality of design is achieved for the site.

The Design Excellence Strategy comprises a multi-phase process including a competitive selection which involved an Expression of Interest (**EOI**) and Request for Tender process, benchmarking studies and continued design review by a Design Excellence Evaluation Panel (**DEEP**) and subsequently the Sydney Metro Design Review Panel (**DRP**). The first three processes have already been completed prior to the lodgement of the previous detailed SSDAs. For the detailed SSDAs, only the last DRP process applies.

As of this year, Sydney Metro Design Review Panel is no longer in operation, therefore the endorsed Design Excellence Strategy is required to be amended to reflect an alternative DRP process. The updated Design Excellence Strategy has been prepared, which requires a new design integrity process to be administered by the State Design Review Panel (**SDRP**).

The updated Design Excellence Strategy will apply to the Northern and Central Precincts and has been submitted to DPHI as 'condition satisfaction' matter under condition A15 of Waterloo Metro Quarter Concept Application SSD-9393.

Prior to lodgement of this SSDA, the SDRP process has been undertaken through a series of four meetings, of which a Sydney Metro representative has observed. Throughout this process, the SDRP has provided ongoing design review of the proposed Central Precinct detailed design proposal to ensure design excellence and integrity have been achieved. The meetings occurred on the following dates:

- SDRP1 – 13th February 2025

- SDRP2 – 27th March 2025
- SDRP3 – 15th May 2025
- SDRP4 – 10th July 2025 (proposal endorsed by panel for lodgement)

The specific details of the consultation undertaken to achieve design excellence in accordance with the Waterloo Design and Amenity Guideline are outlined at Section 5 of this EIS, with a detailed discussion of the proposal's design excellence included at Section 6.

1.5.4. Related Development

Previous Detailed Approvals

Previous approvals have been granted for each of the precincts in the WMQ as outlined in the table below.

Table 4 List of Previous Approvals

SSDA Number	Title	Description	Date of issue
SSD 10439 (This SSD when approved will supersede SSD 10439)	Central precinct detailed DA – subject to the approval of this SSD, SSD 10439 will be replaced by this SSD.	Design and construction of a residential flat building including market and affordable housing, retail and business premises, community facilities and childcare centre.	24/11/21
SSD 10439-Mod-1	Central Precinct detailed DA Modification 1	Minor internal and external design changes to building and landscaping, Clarify condition re: transfer of affordable housing	19/12/23
SSD 10437	Southern precinct detailed DA	Design, construction and operation of a student housing tower and a social housing building and the delivery of open space along Cope Street	30/07/21
SSD 10437-Mod-1	Southern precinct detailed DA Modification 1	Design changes to Southern Precinct Building 3 and Cope Street Plaza	16/08/22
SSD 10437-Mod-2	Southern precinct detailed DA Modification 2	Minor changes to Buildings 3 and 4, to include minor façade and awning details, amend rooftop plant enclosures, rooftop landscape design, additional retail use within gym tenancy.	04/10/22
SSD 10437-Mod-3	Southern precinct detailed DA Modification 3	Extended construction hours and design amendment	19/06/24
SSD 10440 (The new northern precinct SSD-79307758 when approved will supersede SSD 10440)	Northern precinct detailed DA – subject to the approval of the new northern precinct Detailed SSD, SSD 10440 will be replaced by the new approved SSD.	Design, construction and operation of a commercial building including retail premises, business premises and office premises	23/09/21

SSDA Number	Title	Description	Date of issue
SSD-10438	Basement Car Park detailed design SSDA	Excavation and construction of a two-level basement structure within Waterloo Metro Quarter	30/09/2021
SSD-10438-Mod-1	Waterloo Metro Quarter Basement - Modification 1	Design changes to basement configuration. No change to quantum of car parking, motorbike parking, bike parking or loading spaces.	16/08/2022

Concurrent detailed application

A concurrent new detailed SSDA has been submitted for the northern precinct (SSD-79307758) which seeks consent for the design and construction of a residential flat building including market and affordable housing, retail and business premises.

The new detailed SSDAs for the central and northern precincts seek to replace the previous detailed approvals. It is envisaged that following the granting of consent to the new detailed SSDA, a Notice of Surrender would be provided to the Department of Planning, Housing and Infrastructure, requesting / offering the surrender of the previous approval and any associated modifications.

Separately, an application will be submitted to DPHI pursuant to Section 4.55(1A) of the EP&A Act to modify the detailed Basement SSDA (SSD 10438) relating to the shared basement levels under the northern and central precinct.

2. Strategic Context

This section of the EIS describes the key features of the site and its relationship to its local context. It also discusses how the project aligns with relevant strategic planning policy. It identifies other projects that should be considered in assessing the cumulative impacts of the project and also outlines the potential feasible alternatives explored by the applicant.

2.1. Key Features of Site and Locality

The WMQ comprises land to the west of Cope Street, east of Botany Road, south of Raglan Street and north of Wellington Street (refer to the figure below). The WMQ is a rectangular shaped allotment with an overall area of approximately 1.287 hectares.

The central precinct site (**the site**) is approximately 2,800sqm and has frontage to Botany Road to the west and is bounded by the northern precinct to the north, the Waterloo Congregational Church to the south, and Cope Street Plaza to the east.

The site is located within the City of Sydney Local Government Area (**LGA**). The site is situated approximately 3.3 kilometres south of Sydney CBD and 5 kilometres northeast of Sydney International Airport.

The location of the WMQ and the land relating to central precinct is illustrated in **the** figure below.

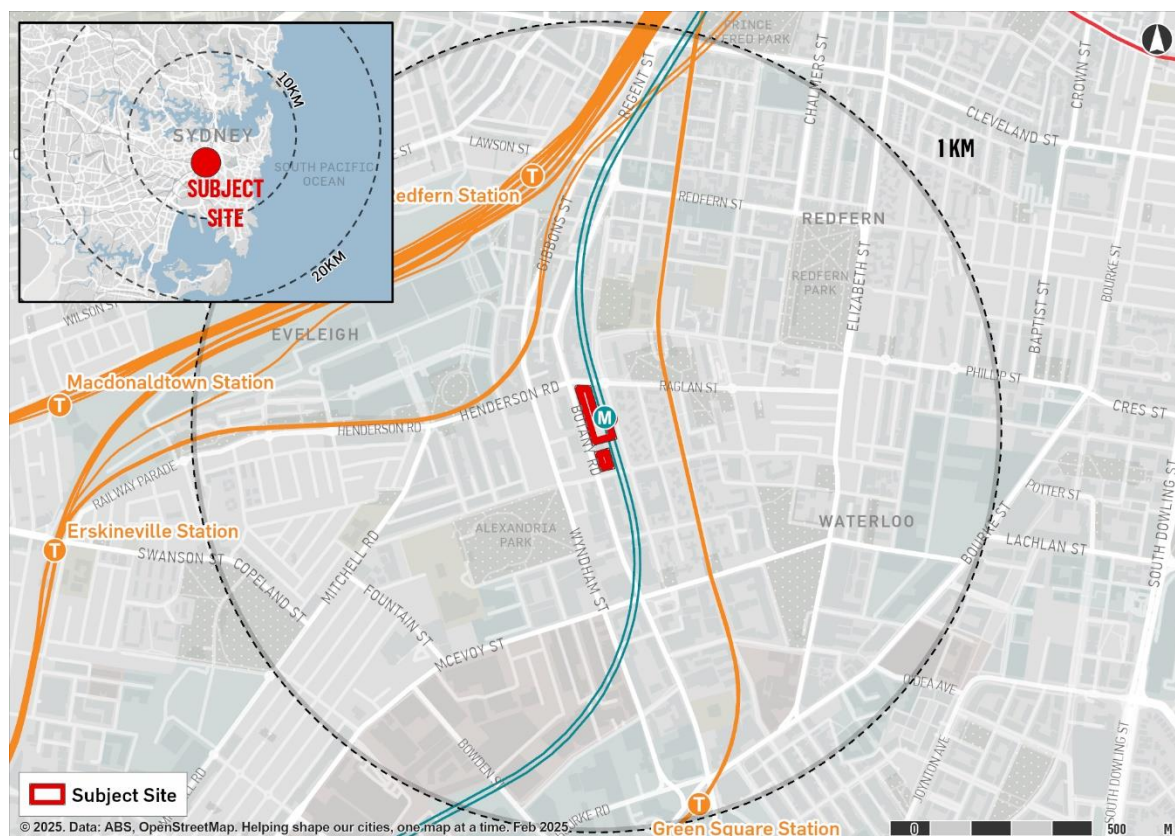
Figure 8 Local Context Map



Source: Bates Smart (2025)

A map of the site in its regional setting is provided as Figure 9.

Figure 9 Regional Context



Source: Urbis

The key features of the site are described in the table below.

Table 5 Site and Locality Description

Characteristic	Description
Key Site Features	
Country	The site is located on Gadigal land and the Gadigal people are identified as the Traditional Custodians of the Country.
Site Name	Waterloo Metro Quarter – Central Precinct
Address	150 Cope Street, Waterloo NSW 2017
Legal Description (Title Particulars)	Lot 2 DP 1274225
Zoning	MU1 - Mixed Use
Existing Use / Structures	The site previously included three to five storeys of commercial, light industrial and shop top housing buildings which were demolished to accommodate the Waterloo Metro and WMQ development. Construction of the WMQ southern precinct buildings commenced in early 2023 and its near its completion. The Waterloo metro station opened in August 2024.
Site Area	2,800 sqm
Site Frontage	Botany Road to the west and is bounded by the northern precinct to the north, Waterloo Congregational Church to the south and Cope Street Plaza to the east.
Restrictions and covenants	No major easements apply to the site.

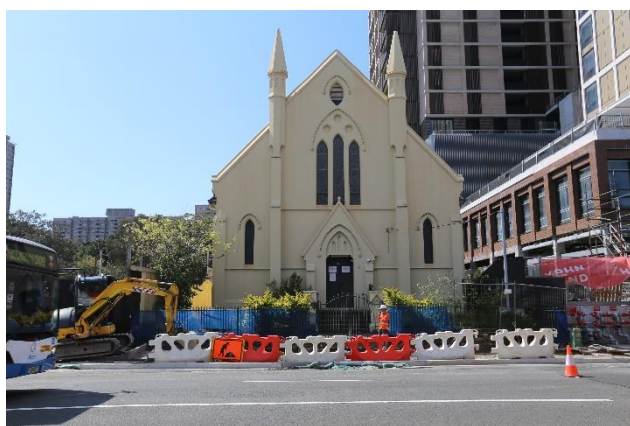
Characteristic	Description
Vehicular/Site Access	The site can be accessed from the surrounding street network including Raglan Street, Cope Street, and Wellington Street. Pedestrians can access the site via dedicated footpaths on all street frontages. Due to traffic volumes on Botany Road, east-west pedestrian movements from the site to adjoining neighbourhoods are limited.
Adjacent land uses North	The proposed northern precinct, which comprises two residential towers (as proposed under SSD-79307758) and the metro station box is located to the north of the site. On the northern side of Raglan Street is a mix of one and two storey commercial buildings with ground floor retail. Further to the north is Redfern Station and Town Centre, which is characterised by a mix of residential, retail and student accommodation uses. Redfern Park is located approximately 500m north-east of the site and is a well-used recreational park with a grassy recreational outdoor space, sports fields, grandstand and children's playground.
Adjacent land uses East	Immediately to the east of the site is the Cope Street Plaza, which will be redeveloped as part of the southern precinct SSDA. On the east side of Cope Street is a mix of one and three storey residential flat buildings and attached dwellings. Waterloo Estate located further to the east of the site will be redeveloped over the next 15-20 years, and will seek to deliver a mix of social, affordable and private housing.
Adjacent land uses South	Immediately south of the site is a proposed shared way separating the site and the Waterloo Congregational Church to the south. To the south of the Waterloo Congregational Church is the southern precinct, which comprise social housing, student accommodation and community facilities. The Metro service box is located to the southeast of the site. Land to the south of Wellington Street is characterised by a mix of low to mid rise industrial, commercial and residential buildings. Immediately to the south of the site on the opposite side of Wellington Street is the Cauliflower Hotel, a locally listed heritage item. Further to the south along Botany Road are a mix of residential apartments and row of terraces. Alexandria Park, a large area of public open space is located to the southwest of the site. Green Square Station and Green Square Town Centre are located approximately 800m south of the site. The town centre comprises a mix of mid to high rise buildings containing retail, commercial, civic and residential uses.
Adjacent land uses West	The site fronts Botany Road to the west. Beyond Botany Road to the west are two and three storey commercial and light industrial buildings, as well as a five-storey mixed use residential flat building. Council recently granted consent for an affordable housing development located at 74-88 Botany Road. The proposal includes ground floor retail fronting Botany Road. Further to the west is the Alexandria Park Heritage Conservation Area (HCA). The HCA comprises a mix of late nineteenth-century houses including one to three storey terraces and cottages. The area also includes corner shop buildings, industrial and warehouse buildings. The Australian Technology Park is a business and technology centre in Eveleigh, located approximately 400m north-west of the site.

Characteristic	Description
Topography	The site generally slopes to the south from the northern portion of the site (AHD 18m) to the southern portion of the site (AHD 16m AHD). The surrounding area is also relatively flat.
Vegetation	There is no vegetation existing on the project site area.
Flooding/Overland Flow	The site is located at the top of the Alexandra Canal catchment which covers approximately 12 km². Drainage systems around the site consist of overland flow paths through road kerb and gutter systems, a local piped drainage system (owned and maintained by the City of Sydney) and a trunk drainage system (owned by Sydney Water Corporation). The WMQ site is located in zone with susceptibility to overland flooding during the 1% Annual Exceedance Probability Event, with ponding notable at the intersection of Cope Street and Wellington Street (i.e. to the south east of the Central Precinct) as well as around the southern precinct.
Heritage	The site is not heritage listed or located within a heritage conservation area under the SLEP 2012. The site is located directly adjacent to the locally listed Waterloo Congregational Church, located at 103-105 Botany Road, which is located within the street block but does not form part of the WMQ site boundaries. The site is also located in close proximity to the following heritage listed items: ▪ Alexandria Park Heritage Conservation Area – local item ▪ I5 Former CBC Bank, including Interior, 60 Botany Road – local item ▪ I2070 Cauliflower Hotel, 123 Botany Road – local item
Bushfire	The site is not identified as bushfire prone land.
Biodiversity	There are no natural habitats present on the site.
Acid Sulfate Soils	The site is classified as containing Class 5 acid sulfate soils.
Utilities and infrastructure	The site is located within an established urban area and currently contains all necessary services including electricity, gas, water, communications, drainage and sewerage. Future development on the site can be connected to these services when required.
Surrounding Locality	
Public Transport	The site benefits from excellent access to public and active transport. The site is located directly above and adjacent to the Waterloo metro station which opened in August 2024 and provides routes to Sydenham and Tallawong, via Sydney CBD, Chatswood and Epping. The site is also midway between the Redfern and Green Square railway stations located approximately 650 m north of the site and 900m south of the site respectively. Additionally, multiple bus routes also run along Botany Rad and Raglan Street which provide access to Eastgardens, Central Station, Redfern, Mascot and Bondi Junction.
Major Roads	The site has frontage to Botany Road which is identified as a classified State road and provides a key corridor connecting the Site to Sydney Airport. McEvoy Street and Henderson Road both run east-west, providing links between the inner west and the Sydney CBD or the eastern suburbs.

Characteristic	Description
Open Space	The site is located in close proximity to public open spaces including sports fields and courts, children's playgrounds, skate parks and grassed lawn areas (Waterloo Park, Redfern Park, Raglan Street Basketball Courts, Erskineville Oval and Alexandria Park).
Social Infrastructure (Schools/Hospitals etc.)	The site is within walking distance to three community facilities and two health facilities. There are eight schools (two primary, four high school and two combined) and 14 childcare facilities within 1km of the site.
Any other key regional characteristic	The site is located approximately 5km north of Sydney airport.

Photographs of the current site condition are provided below.

Figure 10 Site and Locality Photographs



Picture 1 Waterloo Congregational Church

Source: Urbis (2025)



Picture 2 southern precinct (under construction)

Source: Bates Smart (2025)



Picture 3 View of Waterloo metro from Cope Street

Source: Bates Smart (2025)



Picture 4 Existing residential properties to the south of Wellington Street

Source: Bates Smart (2025)

2.2. Other development in the area

The site is located within the suburb of Waterloo which is undergoing substantial renewal associated with the new Metro station. Approved and likely future major projects which may be relevant in the cumulative impact assessment of the proposal are summarised in the table below.

Table 6 Nearby Projects / Development

Project Reference	Development Description	Current Status
SSD-10438 (within the WMQ site)	Excavation and construction of a two-level basement structure within the Waterloo Metro Quarter, comprising: 155 car spaces, 13 motorcycle spaces and 315 bicycle parking spaces - A ground floor slab to cap the basement on which future buildings of the northern precinct and central precinct will be constructed - End of trip facilities and storage - Staged stratum subdivision.	Approved 30 September 2021. Construction works on the basement commenced in February 2023.
SSD-10437 (within the WMQ site)	Construction of the southern precinct within the Waterloo Metro Quarter, comprising: - A student housing tower accommodating up to 474 students - A social housing building containing 70 apartments - A maximum gross floor area of 18,789 sqm (excluding gross floor area approved under CSSI 7400) - Publicly accessible open space including Cope Street Plaza, a shared zone from Cope Street into the site and expanded footpaths along Botany Road and Wellington Street - Building identification signage for student housing building - Staged stratum subdivision.	Approved 30 July 2021. Currently under construction and near completion.
SSD-63067458 100-108 Botany Road And 86-100 Wyndham Street, Alexandria	Construction of a mixed use development comprising health and research facilities and retail uses with ancillary parking.	Under Assessment Lodged 29 October 2024.
Waterloo Estate (South)	Waterloo Estate, located to the east of the site, will be redeveloped over the next 15-20 years, and Waterloo South, the first stage of the redevelopment, seeks to deliver approximately 3,000 social, affordable and market housing dwellings. Under the plan for Waterloo South, the two street blocks directly to the east of WMQ will be developed as a public park of over 2 hectares in size.	Planning proposal approved 28 February 2023. SSDAs to be lodged with DPHI for assessment.

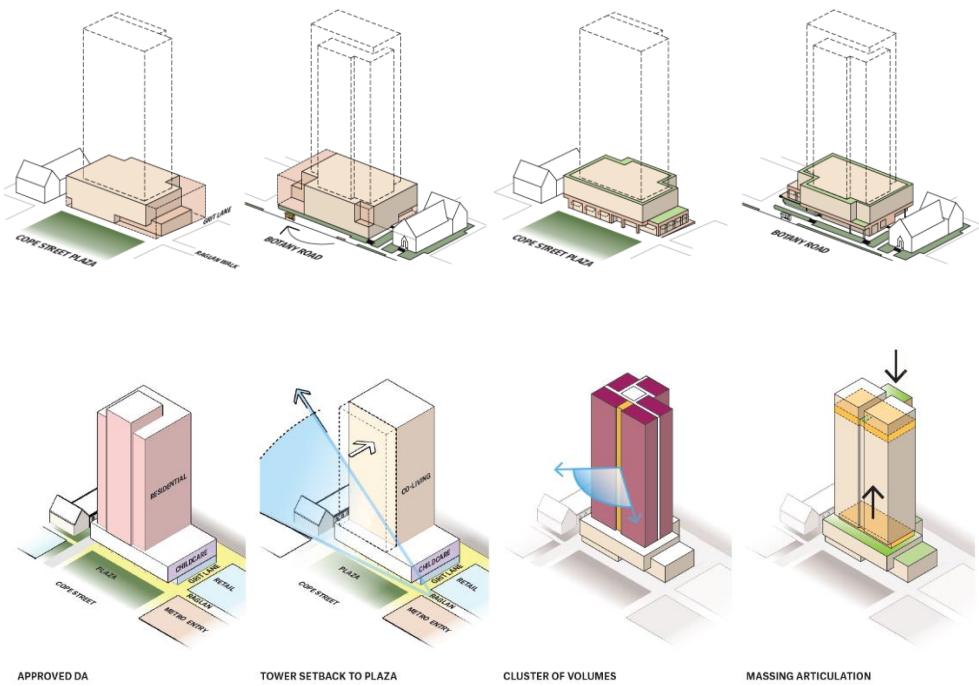
The potential cumulative impacts of the project are addressed in **Section 6** of the EIS and in the respective consultant's reports in accordance with the DPHI *Assessing Cumulative Impacts* guidelines.

2.3. Feasible Alternatives

Clause 192(1)(c) of the *Environmental Planning and Assessment Regulation 2021* (the **Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The project team examined several alternatives to the proposed development as outlined in the table below.

Table 7 Project Alternatives

Option	Discussion
Option 1 – Do nothing (proceed with current approval)	The applicant has considered the alternative to maintain the current approved land use mix, consisting of 126 market apartments and 24 affordable apartments, and the current built form massing. Progressing with this scheme would not capitalise on the opportunity to provide diverse types of residential accommodation, such as co-living housing, across the WMQ site.
Option 3 – Built form massing testing	Prior to locking in the proposed design, the project team has undergone extensive built form masking testing to ensure the proposal is responsive to the surrounding context, does not create significant amenity impact and is cohesive with the northern precinct. The built form evolution has also been guided by the SDRP, where recommendations were tested and mostly adopted to address design excellence. The diagrams below demonstrate the evolution of podium and tower design. Detailed design rationale has been included in the Design Report prepared by Bates Smart and Aileen Sage. 
Option 4 – The proposal	As above, the NSW Government has recognised the need to increase the supply, affordability and diversity of housing to accommodate the State's growing population. The proposed scheme would provide 500 co-living housing units which would provide affordable and flexible housing options. The proposed building massing was considered the most suitable as it complies with the envelope set out in the concurrent second amending concept SSDA and does not exceed the maximum height control or obstacle limitation surface for the site. The proposed massing incorporates generous above-podium setbacks along all elevations, which maintains solar access and sky views within the surrounding public domain. The proposed massing

Option	Discussion
	incorporates clear vertical articulation to minimise the perceived bulk of the tower. The massing of the podium maintains the curtilage around the adjacent Waterloo Congregational Church and allows for a greater setback to Botany Road. Most importantly, the proposal is able to create an additional area of public plaza - Grit Square, through the increased setback to Botany Road. This new Plaza is integrated with the bus stop and provides a generous buffer between the busy road, the retail tenancies and lobby areas within the Central Precinct. Increased setback to Cope Street Plaza is also proposed, which provides improved public domain outcome and additional opportunities for outdoor seating and activation. Accordingly, this option was selected as the most appropriate pathway forward as it delivers the most orderly development outcome, that is both viable for the Applicant and delivers significant public benefit through the provision of additional public plaza areas and 500 additional co-living units.

2.4. Strategic Planning Alignment

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined in the table below.

Table 8 Strategic Planning Consistency

Plan	Detail
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Region Plan (Regional Plan) is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Region Plan, the site is located within the Eastern City District, which forms as part of the Eastern Harbour City. The project is consistent with the Regional Plan for these reasons: ▪ In accordance with objectives 10 and 11, the proposed co-living tower provides flexible living arrangements. With shorter lease terms and all-inclusive rent packages, it provides an adaptable housing option for those who may not want or need long-term commitments, addressing the need of a range of housing types to meet the needs of different community groups. ▪ In accordance with objective 14, the development leverages its proximity to the Waterloo metro station, enhancing public transport accessibility. This supports the Plan's objective of a 30-minute city, where most residents can access jobs, education, and services within 30 minutes by public transport. ▪ In accordance with objective 6 and objective 12, the inclusion of ground-level retail, a community facility tenancy, and a childcare centre contributes to the creation of a mixed-use development that supports community interaction and provides essential services. This aligns with the Plan's emphasis on creating liveable and sustainable communities with accessible local services.

Plan	Detail
	▪ In accordance with objective 18, the project includes the creation of a new public plaza along Botany Road and a pedestrian thoroughfare, promoting walkability and active transport. This supports the Plan's objective to reduce car dependency and encourage the use of public and active transport modes, contributing to a healthier and more sustainable urban environment.
Eastern City District Plan	The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The project is consistent with the Eastern City District Plan for these reasons: ▪ Planning Priority E1 - The project's location within the Central Precinct of the WMQ supports the priority of enhancing public transport accessibility, promoting the use of public transport, and contributing to the creation of a 30-minute city. The proposal directly benefits from the development of the Waterloo metro station by providing a childcare centre, community facilities and retail adjacent to transport infrastructure. The development facilitated by the detailed SSDA aligns with the place-based infrastructure service which encourages active transit methods such as walking and cycling. ▪ Planning Priority E5 - The co-living housing tower addresses the need for diverse and flexible housing options, aligning with the priority of increasing housing supply and diversity to meet the needs of different community groups. ▪ Planning Priority E10 - By locating co-living housing above Waterloo metro station, the proposal contributes to the vision for a 30-minute city. Further, the proposal is considered sustainable as it is likely to result in a high proportion of trips by public transport, walking and cycling trips to reduce emissions and health.
City of Sydney Local Strategic Planning Statement	The City of Sydney Local Strategic Planning Statement (LSPS) is a 20-year plan and land use vision that seeks to appropriately develop jobs, homes, and infrastructure in conjunction with the identified priorities of the City of Sydney community. The project is consistent with the LSPS for these reasons: ▪ Sustainability Priority 1: Movement for walkable neighbourhoods and a connected city by enhancing public transport accessibility and promoting active transport through pedestrian thoroughfares and public domain works. ▪ Liveability Priority 3: Diverse, affordable, and inclusive housing by providing co-living accommodation, addressing the need for diverse and flexible housing options. ▪ Additionally, the inclusion of new public plaza, ground-level retail, community facilities, and a childcare centre supports Productivity Priority 5: Creating great places by fostering vibrant, mixed-use environments that enhance community interaction and local economic activity.

Plan	Detail
Housing for All – City of Sydney Local Housing Strategy	Housing for All – City of Sydney Local Housing Strategy provides a plan to increase housing supply, diversity, and affordability to meet the needs of current and future residents. The proposal is consistent with the Housing Strategy as it would contribute to the increase in housing supply and diversity, particularly through its co-living housing model that accommodates 500 units. This aligns with the strategy's emphasis on providing affordable and innovative housing solutions to meet the needs of diverse community groups. Co-living housing offers shared living spaces with private bedrooms and communal areas, that caters to a wide range of demographics, including young professionals, students, and even older adults seeking community and affordability. This model promotes social interaction and a sense of community, which can be particularly appealing in urban environments where isolation is a growing concern. Co-living also addresses the need for flexible living arrangements. With shorter lease terms and all-inclusive rent packages, it provides an adaptable housing option for those who may not want or need long-term commitments. This flexibility is crucial in today's dynamic job market and lifestyle trends. Additionally, the integration of ground-level retail, community facilities, and a childcare centre supports the creation of sustainable and liveable communities, enhancing the overall quality of life for residents and fostering vibrant, mixed-use urban environments.
Future Transport Strategy	The NSW Future Transport Strategy is a long-term plan for transforming the transportation landscape in New South Wales. It aims to create a modern, efficient, and customer-focused transport system that can adapt to emerging technologies and cater to the evolving needs of a growing population. The strategic location of retail tenancies, community facilities, a childcare centre and co-living housing units adjacent to Waterloo metro station delivers economic benefits for Sydney by enhancing connectivity between businesses, dwellings and people. The proposal provides an opportunity to boost the city's productivity by allowing residents to access jobs faster and more reliably. The central precinct boasts proximity to public transport opportunities for site users/visitors, which encourages the use of existing active transport networks to reduce automobile reliance, to decrease congestion and to reduce environmental impacts.
State Infrastructure Strategy 2018-2038	The <i>NSW State Infrastructure Strategy 2018 - 2038</i> sets out the NSW Government's vision for infrastructure over the next 20 years, focusing on aligning investment with sustainable growth. For metropolitan NSW, the primary goal is to provide residents with access to jobs and services within 30 minutes, known as the '30-minute city' model. The project enhances public transport accessibility by leveraging its proximity to the Waterloo metro station, aligning with the Strategy's objective to improve transport connectivity and create a 30-minute city. Additionally, the development promotes sustainable urban growth by integrating co-living, retail,

Plan	Detail
	and community facilities, which supports the Strategy's goal of fostering vibrant, mixed-use precincts that enhance liveability and economic productivity. The inclusion of diverse housing options, such as co-living accommodation, addresses the Strategy's priority to provide affordable and diverse housing solutions, ensuring that infrastructure investments meet the needs of a growing and diverse population. The proposal has been designed with consideration of the life cycle of the asset so that the integrated station and OSD solution is 'future-proofed', and that the life, availability and use of railway infrastructure on the site are appropriately safeguarded.
Sustainable Sydney 2030-2050	<i>Sustainable Sydney 2030-2050</i> is a long-term plan prepared by the City of Sydney to achieve a green, global and connected city. It contains ten strategic directions, of which the following are relevant and will be delivered by the proposal: ▪ A globally competitive and innovative city; ▪ Integrated transport for a connected city; ▪ A city for walking and cycling; ▪ A lively and engaging city centre; and ▪ Housing for a diverse population. The project enhances public transport accessibility through its proximity to the Waterloo metro station, supporting the objective of reducing car dependency and promoting sustainable transport options. By integrating diverse housing options, including co-living accommodation, the development addresses the priority of providing affordable and inclusive housing. The inclusion of ground-level retail, community facilities, and a childcare centre fosters vibrant, mixed-use precincts that enhance community interaction and local economic activity, aligning with the goal of creating lively and liveable neighbourhoods. Additionally, the project's design promotes walkability and active transport, contributing to the vision of a more sustainable and connected urban environment.
Development Near Rail Corridors and Busy Roads – Interim Guideline	The <i>Development Near Rail Corridors and Busy Roads – interim guideline</i> assists in the planning, design and assessment of development which is in or adjacent to rail corridors and busy roads. The application of the guideline shares a close relationship with the <i>State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)</i>, supporting specific rail and road provisions contained within. The guidelines relate to development impacted by rail corridors and busy roads, in terms of noise and vibration and air quality, as well as the potential impact of adjacent development on roads and railways, with regards to safety and design issues and excavation, earthworks and other construction-related issues. The Waterloo Metro Quarter OSD proposal capitalises on concentrating residential dwellings above the Waterloo metro station, thus improving access and opportunities for increased rail patronage.

Plan	Detail
	Noise and vibration impacts to the co-living accommodation and childcare centre has been assessed at Appendix T and are considered in Section 6 below.
Guide to Traffic Generating Development	The TfNSW <i>Guide to Transport Impact Assessment</i> outlines all aspects of traffic generation considerations relating to developments. The Guide establishes the grounds for traffic impact assessment in terms of daily traffic volumes and peak traffic volumes for residential and retail land uses. This detailed SSDA is accompanied by a Transport, Traffic and Parking Impact Assessment prepared by PTC (Appendix R), which considers the strategic context of this guideline and the statutory context of the Transport and Infrastructure SEPP as the basis for assessment. Traffic generation impacts are also discussed in further detail in Section 6.
Heritage Council Guidelines	This SSDA is supported by Heritage Impact Statement prepared by Urbis attached at Appendix Y . The heritage assessment report provides a comprehensive assessment of key heritage impacts and establishes the heritage management framework for the development of the site. Heritage impacts are further discussed in Section 6.
Better Placed	Better Placed is an integrated design policy for the built environment developed by the NSW Government Architect. The policy aims to enhance the quality of life for the people of New South Wales by promoting good design in the planning, design, and construction of buildings, spaces, landscapes, and neighbourhoods. The project is consistent with the seven key Better Placed objectives as it has been subject to an extensive design review that involved a collaborative, cyclical and iterative process. The final design outcome will accommodate a built form that is sustainable, functional, sensitive to its context and visually distinctive as encouraged by objectives of Better Placed, in line with the amended concept DA.
Connecting to Country Framework	The NSW Government Architect's "Connecting to Country" framework aims to integrate Aboriginal cultural knowledge into the planning, design, and development of the built environment. It seeks to foster a deep respect and understanding of the Aboriginal connection to Country, promoting its recognition and celebration in contemporary design and planning. The framework serves as a guide to create spaces that are culturally inclusive, sustainable, and reflective of Australia's rich Aboriginal heritage. An underlying Country narrative that acknowledges and responds to the site's long and layered history will be evident across the public domain and woven through the ground plane through planting selections, artworks, and interpretive elements in the adjoining Cope Street Plaza. The public domain and landscape design has incorporated the work by Murawin and been informed by four guiding principles identified through Listening to Country engagement sessions held in June 2025: ▪ Amplify Blak Excellence ▪ Design for Everyone

Plan	Detail
	▪ Celebrate with Local Culture ▪ Embed Shared Power These guiding principles have been reflected in the landscape and public domain through: ▪ Co-designed public artwork opportunities and naming strategies developed in collaboration with the community and led by local artists and knowledge holders is proposed within the Central precinct ▪ Opportunities for interpretation of elements embedded within the design character incorporating visible cultural cues, colours, symbols and signage across the site ▪ Implementing a native and endemic planting palette that supports local biodiversity while providing opportunities for knowledge-sharing about Indigenous flora and cultural connections to landscape ▪ Prioritising universal access throughout the public domain, ensuring safety, comfort and inclusivity for Elders, children, young people and the broader indigenous community of Waterloo-Redfern
Child Care Planning Guidelines 2017	Development consent is sought for the use and general location of the childcare centre. The fit-out and operational details shall be the subject of a future DA. Under Chapter 3 of the Transport and Infrastructure SEPP, a consent authority must take into consideration the DPHI's <i>Child Care Planning Guideline 2021</i> (the Childcare Guideline) when assessing a DA for a childcare facility. Part 3 of the Childcare Guideline includes matters which must be considered by the consent authority when assessing a DA for a childcare facility. Part 4 of the Childcare Guidelines provides the requirements for internal and external areas of Childcare facilities as per the National Quality Framework (NQF). Given this SSDA is only seeking consent for the use and general location childcare centre, detailed assessment against Part 3 and Part 4 of the Childcare Guidelines will be undertaken as part of the future childcare fit-out DA. Notwithstanding, Part 3 'Matters for Consideration' and Part 4 '<i>Applying the National Regulations to development proposals</i>' has been considered and assessed when designing the podium level floor plate, to ensure a high quality and compliant childcare centre can be accommodated in the future. A preliminary assessment has been undertaken by Urbis and is summarised in Appendix NN.

2.5. Justification Summary

The project is considered to be aligned with the overall strategic context for these reasons:

- The project has considered the key site characteristics through a detailed analysis of the relevant constraints. The proposal will provide 500 co-living housing units, which provides a diverse type of housing to assist with the housing crisis. The design of the development has been carefully considered to respond to the surrounding built form and environmental characteristics, including appropriate sustainability measures.
- The project has considered the wider locality including surrounding infrastructure, public transport and the cumulative impacts of other projects in accordance with DPHI's Cumulative Impact Assessment Guidelines for State Significant Projects. By co-locating housing, retail and community services adjacent to the new Waterloo metro station, the project leverages significant state investment in public transport infrastructure to enhance accessibility. The development of the proposal has taken into consideration other projects within the Waterloo Metro Quarter and broader Waterloo precinct including the management of any concurrent construction impacts.
- The project has considered alternatives and how these would meet the objectives of the development, this includes the consequences of not carrying out the development and multiple envelope testing. The analysis has found that the proposal offers a balanced land use mix, provides a sensible built form response and improves the public domain. The proposal enhances housing diversity by providing 500 co-living units, providing affordable and flexible living arrangements
- The project is aligned with the relevant State and local strategic planning policies as it would significantly contribute to the diversity and affordability of the State's housing stock. It supports the co-location of residential, community and retail uses with significant state government public transport investment, boosting city productivity by improving access to jobs. Additionally, the proposal enhances the public domain and pedestrian experience, fostering community interaction and creating liveable, sustainable communities.
- The delivery of co-living housing on the site will address an anticipated continued demand for this type of accommodation in Sydney. This type of residential accommodation will provide relative affordable housing option for growing population of lone and couple person households. More importantly it is a diverse type of accommodation in a high amenity location.

3. Project Description

The following section of the EIS summarises the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. Project Overview

The key components of the proposed development are summarised below. A copy of the architectural drawings is provided as **Appendix E**.

Table 9 Project Summary

Project Element	Summary
Project Summary	Design, construction and operation of a 26 storey (RL 99.65) (including rooftop plant) mixed use OSD located in the central precinct of the WMQ site. The proposed development comprises of the construction of: ▪ Ground level retail tenancies, community facility, and childcare, co-living and shared basement access lobbies ▪ Community centre in the form of a childcare centre at Level 1 and Level 2 ▪ A co-living housing tower from Levels 3 to 24 comprising: – Self-contained co-living accommodation rooms across 20 levels, with capacity for 500 units – Indoor and outdoor communal amenity at Levels 3 and 24 – Communal space also provided on each accommodation level (apart from Level 4) ▪ Ground level vehicular access from Church Square shared zone to the shared basement. ▪ Creation of a pedestrian thoroughfare that connects with Cope Street Plaza, creation of Grit Square fronting Botany Road, landscaping and public domain works. ▪ Indicative building signage zones
Site/Project Area	2,800 sqm
Proposed uses	▪ Retail ▪ Community uses (including a childcare centre) ▪ Co-living housing
Earthworks/Remediation	All excavation required for the basement are subject to the Basement SSDA, no excavation works are proposed for the Central Precinct.
Gross Floor Area (GFA)	Retail 634m² Community Childcare centre: 2,254m² Other: 76 m² Total: 2,330 m² Co-Living accommodation 14,480 m²

Project Element	Summary
	Total 17,444m ²
Co-living units	500 units
Maximum height	RL 99.65 m Ground plus 25 storeys (including plant level)
Setbacks	Podium North: 6 metres East: 6 metres (NE corner ground floor) South: 10 metres West: minimum 6.5m (ground floor) Tower North: 15 metres – 26 metres East: 5 metres South: 13 metres West: 6 – 6.6 metres
Vehicular Access	Vehicular access from Cope Street to the Church Square shared zone to the basement car park
Parking	Parking for the central Precinct will be provided within the shared basement below the northern and central precincts, as approved under a separate basement SSDA (SSD 10438). 1 space for staff of the childcare centre 4 drop-off spaces for the childcare centre
Cycle Parking	74 spaces *the majority of cycle parking is provided within the basement, which is subject to a separate SSDA.
Jobs	Across the entire WMQ site: Construction – 646 full time equivalent jobs Operation – 645 on-going full-time equivalent jobs
Estimated Development Cost	\$112,811,180

3.2. Proposed land uses

The proposed land uses in Building 2 comprise:

- **Ground floor:** retail premises, a community facility and lobby areas.
- **Level 1 and Level 2:** community facility in the form of a childcare facility
- **Levels 3 – 24:** Co-living accommodation

The ground floor will include multiple retail tenancies and a community facility. Licenced outdoor seating areas will be provided for the retail tenancies with frontages onto Grit Lane and Cope Street Plaza. Pull-out awnings will be installed to provide weather protection to these outdoor seating areas.

A community facility is also proposed on the ground floor and will have an GFA of 61 sqm. Access to the community facility will be provided via Cope Street Plaza.

Entrance lobbies for the co-living accommodation; childcare facility and basement access as well as amenities and a plant room will be provided on the ground floor level. Access to each of the entrance lobbies will be provided from the building's western elevation adjacent to Botany Road.

Levels 1 and 2 of the proposed building will contain a childcare centre with capacity for 131 children. Both levels will contain three (3) internal playrooms as well as two (2) large simulated outdoor play spaces. A reception area, staff room, amenities and storage rooms will also be provided within both levels of the childcare centre.

The childcare centre will be operated by a non-profit community organisation and is to service the Waterloo community. The operation of the community childcare centre is consistent with the definition of a 'community facility' as defined under *Sydney LEP 2012*, and will deliver the required community facility floor space as required under the concept DA:

"community facility means a building or place—

(a) owned or controlled by a public authority or non-profit community organisation, and

(b) used for the physical, social, cultural or intellectual development or welfare of the community,

but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation."

Levels 3 – 24 will comprise co-living accommodation. A large reception and communal area will be provided at Level 3 with additional communal facilities and residential amenities located at Level 24. Twenty five (25) co-living units will be provided at each level (Level 4 – 23), including one premium room. In total, 500 co-living units will be provided comprising:

- 480 x single studios
- 20 x premium studios including DDA typical rooms.
- A communal room for residents will be provided at each level (except Level 4).
- The co-living tower will have nineteen (19) typical floors and one (1) atypical floor (Level 4 being atypical) consisting of twenty four (24) standard studios and one premium studio. Accessible rooms are provided in-lieu of the premium rooms on Levels 4 – 6.

The fit-out and operation detail of the retail, community facility and childcare premises are subject to future approvals.

3.2.1. Hours Of Operation

The proposed hours of operation for the retail tenancies and ground floor community facility is to be confirmed and will form part of future fit out DA. The proposed operational hour of the childcare centre is from 07:00am – 19:00pm (Monday – Friday).

3.3. Built form and design

The proposed development comprises the construction of a twenty six (26) storey mixed-use building (including roof top plant). The building will have a broadly rectilinear form with a large recess in its north-western corner and comprise a three (3) storey podium (Ground Floor, Level 1 and Level 2) and tower above.

At ground floor level, the podium will be characterised by large glazed shopfronts with associated outdoor seating areas with awnings above. A colonnade and covered walkway will be located in the north-eastern and south-western corners of the site respectively.

The childcare centre will be located at Level 1 and Level 2 of the podium. Recesses within the podium façade will provide natural ventilation to the childcare centre's simulated outdoor play spaces. The northern elevation is set back to maximise the separation distance with the northern precinct development.

The tower is further setback from the podium and incorporate efficient floorplates, creating a slender form distinct from the podium below. The top of the tower will be demarcated by a distinctive ‘crowning’ feature that extends above the rooftop terrace.

Figure 11 Proposal as viewed from Cope Street



Source: Bates Smart (2025)

Figure 12 Proposal as viewed from Botany Road



Source: Bates Smart (2025)

3.3.1. Materials and Finishes

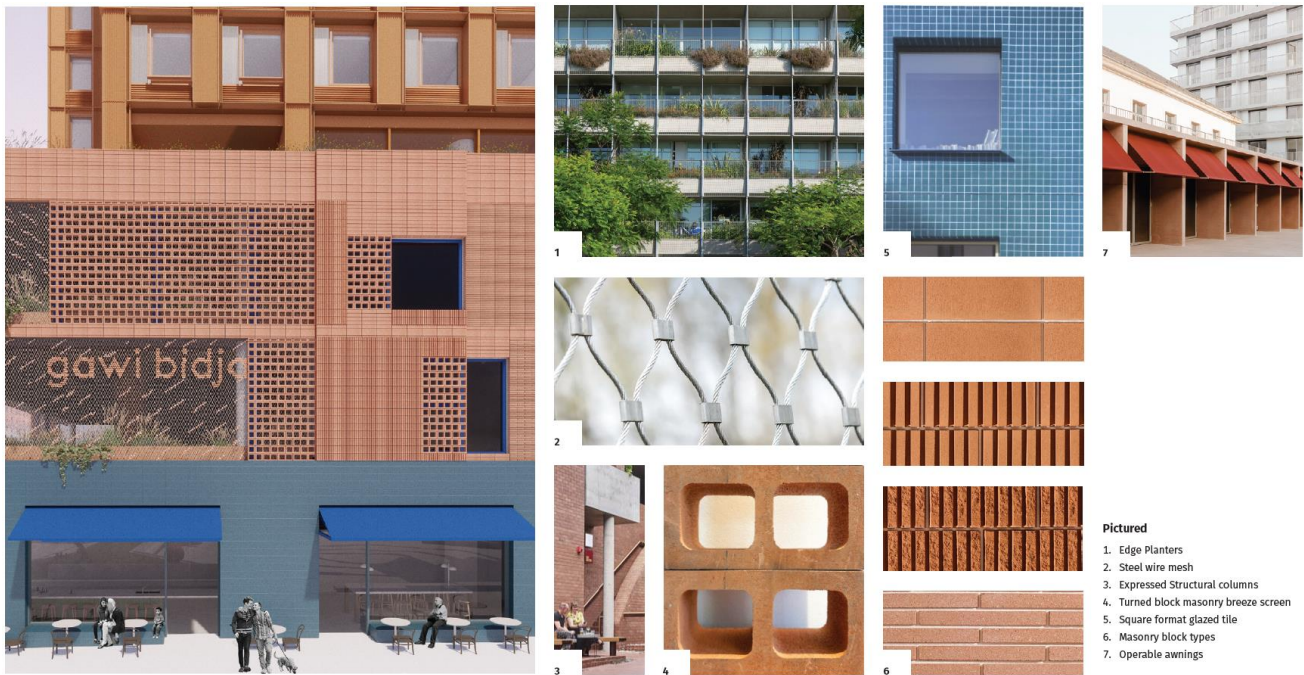
The proposed material palette for Building 2 comprises:

Podium

- Square format glazed tiles with blue coloured finish (ground floor)
- Terracotta coloured masonry breeze screens (Level 1 and Level 2)
- Terracotta coloured masonry block types (Level 1 and Level 2)
- Steel wire mesh located over façade openings (Level 1 and Level 2)
- Edge planters (Level 1 and Level 2)
- Exposed structural columns

Operable awnings will also be provided at ground floor level for the retail tenancies and community facility.

Figure 13 Podium material palette

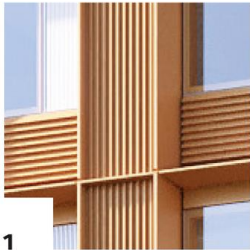
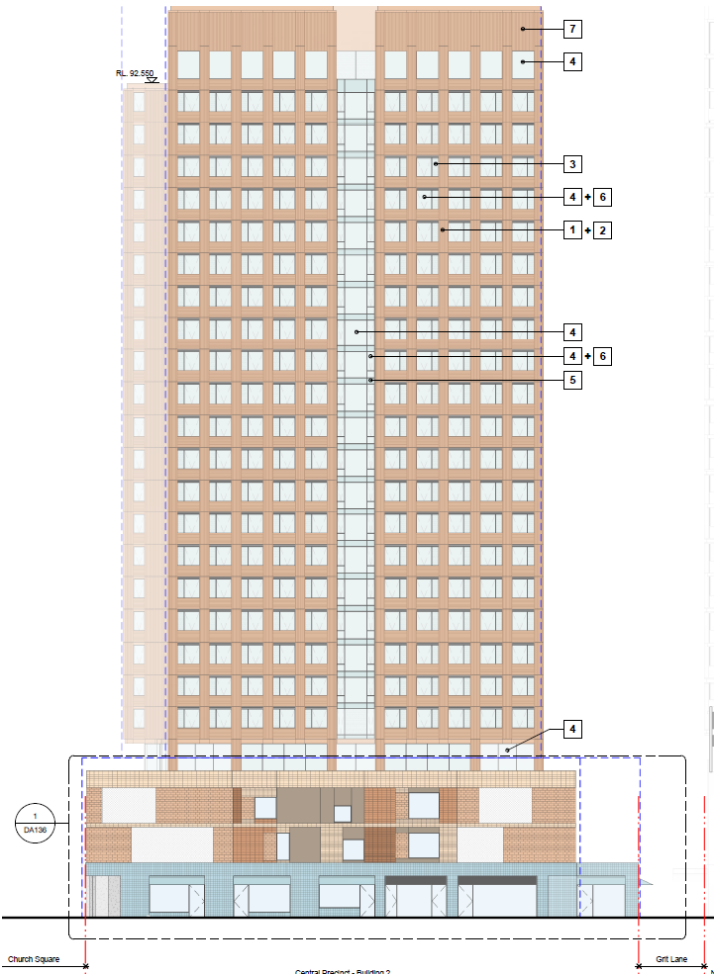


Source: Bates Smart (2025)

Tower

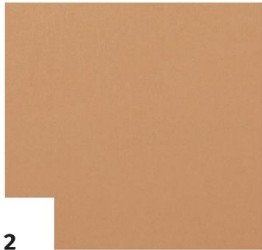
- Terracotta coloured aluminium cladding
- Aluminium curtain wall system and plant louvres (terracotta coloured)
- High performance neutral-grey glass and vision glazing
- Stainless steel meshing

Figure 14 Proposed tower materials - eastern elevation



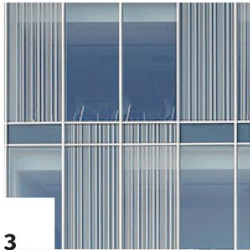
1

Aluminium unitised curtain wall system in a terracotta colour with projecting metal textured profiles



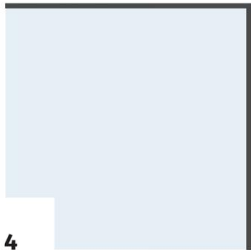
2

Extruded aluminium vertical and horizontal sunshades in a terracotta colour



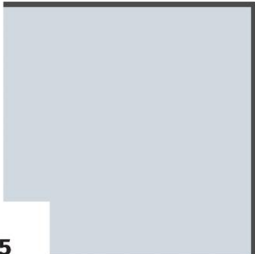
3

Fixed glazed sidelight



4

High performance DGU of neutral-grey (non-green) glass with VLT greater than 60%



5

Vision glazing identical to material 4 with opaque insulated shadow box within unitised curtain wall system



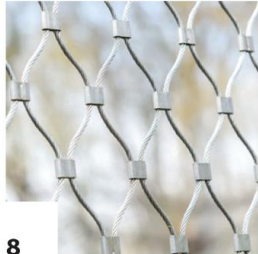
6

Aluminium unitised curtain wall system in a terracotta colour with structurally glazed awning sash



7

Aluminium framed unitised curtain wall system with plant louvres in terracotta colour



8

Stainless steel tensile mesh

Source: Bates Smart (2025)

3.4. Public Domain

The Landscape and Public Domain Report prepared by Aspect Studio is included in **Appendix O**. The report details the WMQ site wide public domain strategy, including public domain works to be delivered as part of the Central Precinct, as well as the landscape design for the Central Precinct.

The public domain works for Church Square, creation of Grit Square, extension of Cope Street Plaza and landscaping along the Botany Road frontage will be delivered as part of the Central Precinct SSDA. It should be noted that Grit Lane is to be delivered under the CSSI approval and does not form part of this SSD. The outdoor seating within Grit Lane is proposed as part of the Central Precinct SSD.

The extent of works proposed under this SSDA is shown in the figure below and summarised as follows:

- Grit Square is a new public plaza created within the central precinct. It will comprise a welcoming public space fronting Botany Road, featuring generous deep soil planting and a grove of trees. The square will provide a green and inviting arrival experience to the central precinct. The square will incorporate outdoor seating areas associated with the ground floor retail tenancies.
- Church Square will be located between Building 2 and the Waterloo Congregational Church to the south. It is a shared zone for pedestrians, cyclists and vehicular cars. This area features a generous planted buffer along the northern Waterloo Congregational Church boundary, with new tree planting in deep soil, seating opportunities and a singular paved surface.
- Cope Street Plaza extends into the site along its eastern boundary. This area will connect with Raglan Walk providing a central thoroughfare across the entire Site. Outdoor seating areas for the ground floor tenancies in Building 2 are also proposed within this part of the public domain to provide activation.
- Grit Lane will be delivered as part of the CSSI and does not form part of the central precinct approval. The central precinct proposes level seating area within the laneway, which provides usable external space for the retail tenancies fronting onto the lane with retractable awnings for weather protection.

The public domain will incorporate several deep soil zones (located along the western and southern boundaries of the site) as well as other large planters and permeable paving. Tree planting will be primarily located adjacent to Botany Road and along Church Square.

Integrated seating will also be provided along the site's western frontage and within Church Square.

Figure 15 Public domain and ground floor landscaping



Source: Aspect (2025)

3.5. Public Art

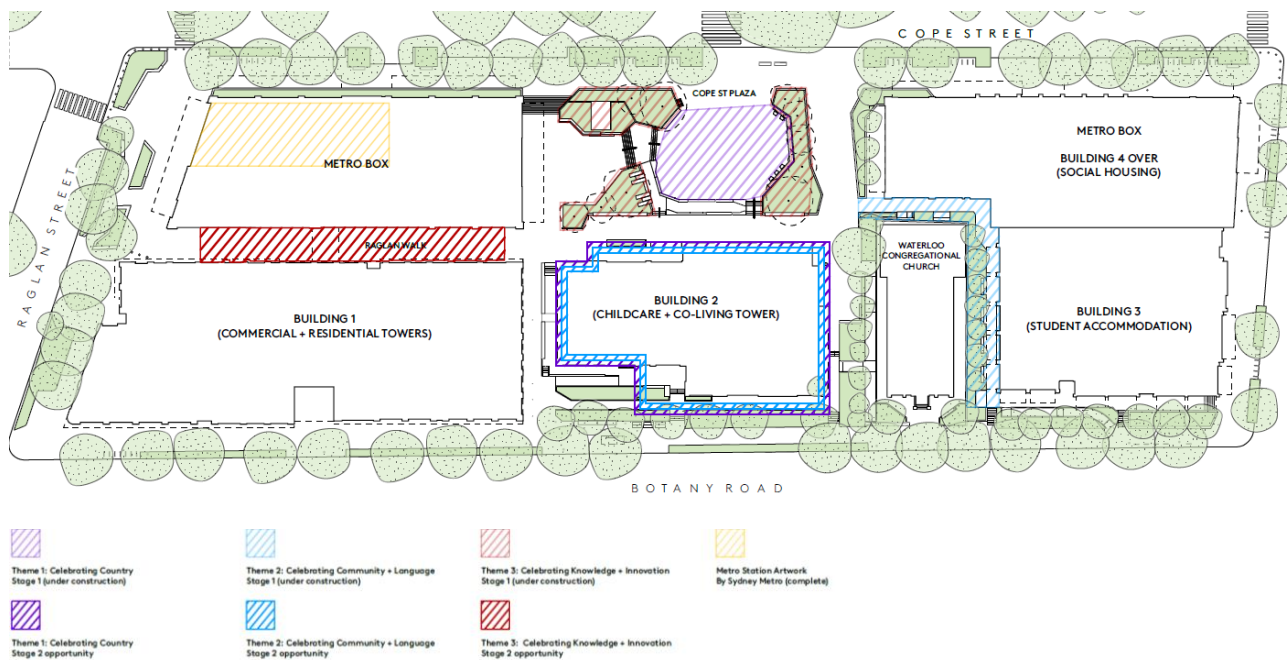
A public art strategy has been prepared for the wider WMQ site as shown in the figure below. Opportunities for public art has been explored within the central precinct. The strategy identifies two opportunities to incorporate public artwork within the central precinct. These opportunities will celebrate Country, community and language.

It is proposed for public art to be designed by local Aboriginal artists and integrated within the western and eastern elevations of the podium. The proposed public art celebrates Country, provides opportunities for storytelling and will contribute to the site's evolving character.

The proposed artwork will incorporate Gadigal language, which invites people into the site and provide well-wishes to passersby.

The artwork will be highly visible from the public realm (located on the most prominent facades) and will provide further visual interest within the site.

Figure 16 WMQ Public Art Strategy



Source: Ailen Sage (2025)

Figure 17 Proposed public art for central precinct



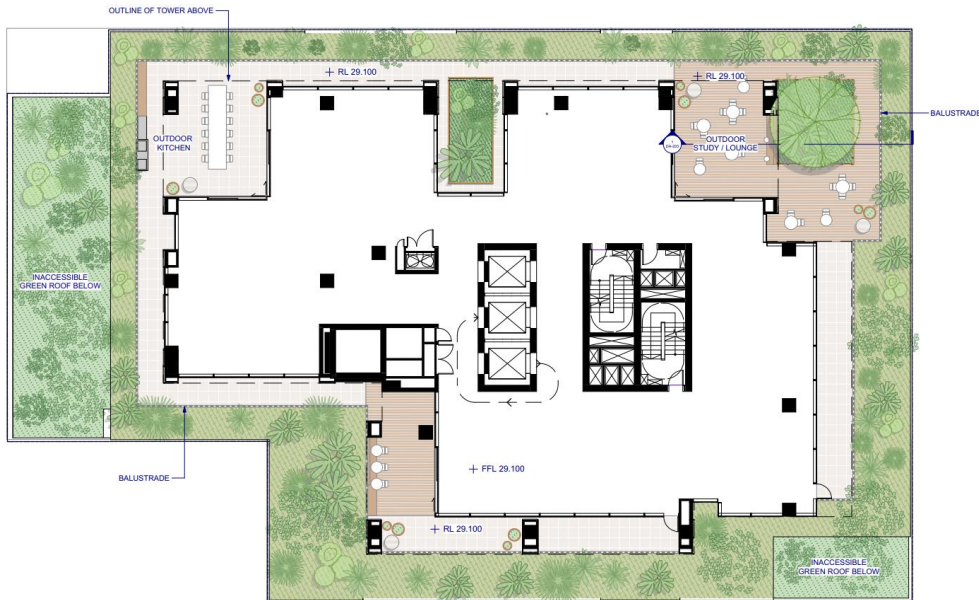
Source: Bates Smart (2025)

3.6. Elevated Outdoor Communal Areas

Communal terraces are proposed at Level 3 and at Level 24. Access to these terraces will only be available to residents of the proposed co-living accommodation.

The terraces will support outdoor dining, working and small communal gatherings and incorporate a range of spaces for social interaction. The terrace at Level 3 will extend around the perimeter of the building and incorporate outdoor BBQ and seating areas, timber decks and planting.

Figure 18 Level 3 terrace

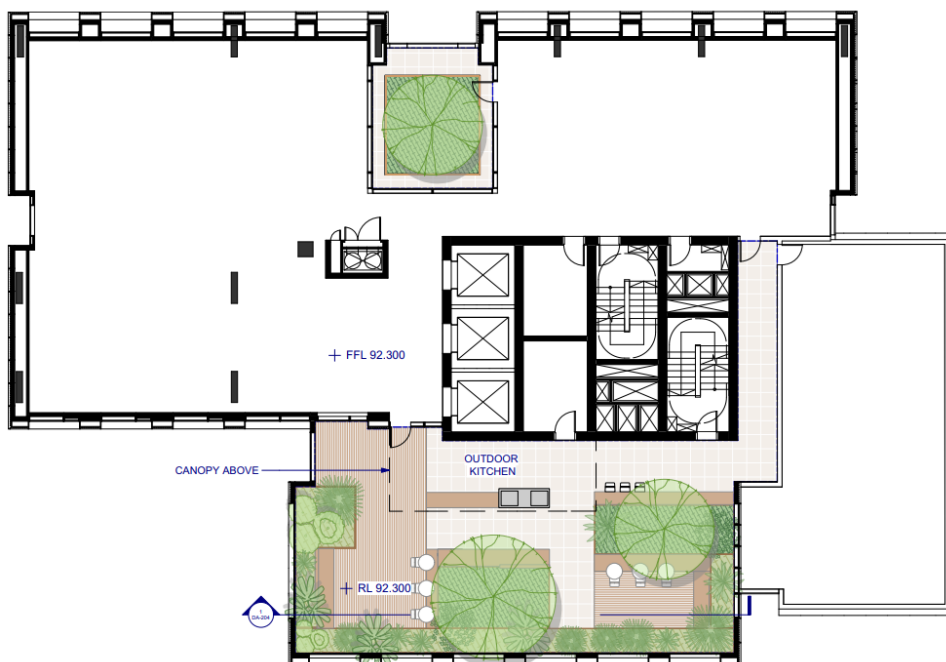


Source: Aspect (2025)

The rooftop terrace will contain an outdoor seating and BBQ area with planting including two medium sized trees. A canopy will provide weather protection to this space.

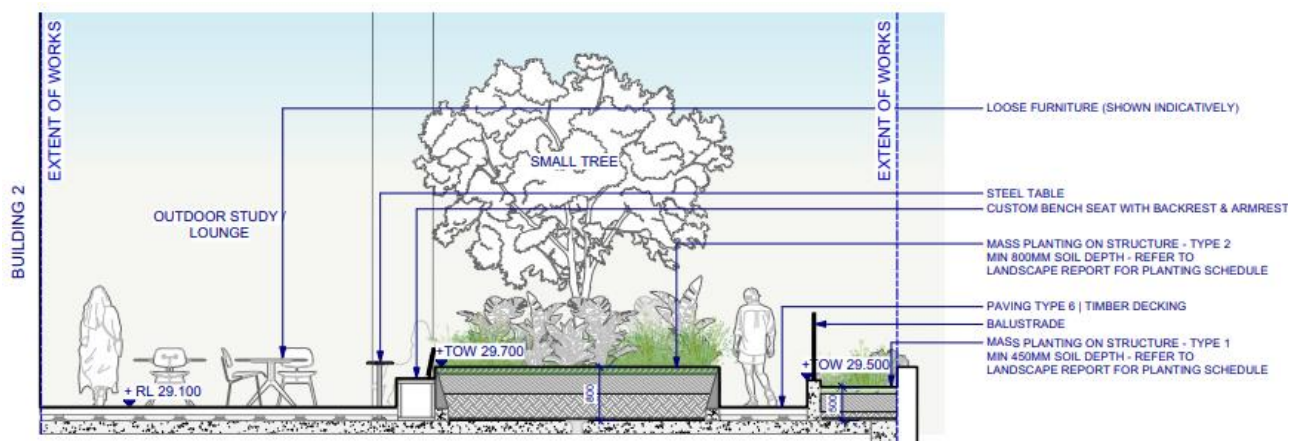
Generous areas of inaccessible green roof are also proposed at Level 3 to enhance greenery.

Figure 19 Level 24 terrace



Source: Aspect (2025)

Figure 20 Level 3 terrace planting section



Source: Aspect (2025)

3.7. Parking

3.7.1. Car parking and vehicle access

No car parking is proposed for the co-living accommodation, retail or community uses (excluding childcare centre) within Building 2. One staff parking space and four drop-off spaces are proposed for the childcare centre and will be located within the shared basement below the central and northern precincts.

The basement will be constructed as per the SSD approval SSD-10438 (as amended). Accordingly, the basement does not form part of this application for the central precinct.

A vehicular entrance to the basement car park parking will be located on the southern elevation of Building 2 and accessed from a shared laneway connecting to Cope Street. Vehicles will only be able to access the basement from Cope Street.

The basement entrance has been located to minimise its perceptibility from the surrounding public domain and reduce potential conflict with pedestrians. The location of the car park entrance also provides greater opportunities for landscaping in Church Square and results in an improved environmental outcome compared to the previously approved scheme.

3.7.2. Bicycle Parking

Bicycle parking spaces will be provided in the public domain for visitors to the site. Visitors will be free to use any of the bicycle parking spaces located around the WMQ site, including those proposed along the site's Botany Road frontage.

Cycle parking for staff of the retail tenancies and childcare facility will be provided within the basement. A total of 16 cycle parking spaces will be provided. The basement has been approved under a separate SSDA (SSD-10438).

3.7.3. Loading and deliveries

Loading and unloading for Building 2 will be undertaken via a shared loading dock located in the northern precinct. The loading dock facilities will be located at ground floor level in the northern precinct and incorporate a refuse bay (capable of accommodating one medium rigid vehicle and one small rigid vehicle). The loading bay can be accessed via Botany Road.

Five (5) courier service bays will also be provided in the shared basement.

3.8. Signage Zones

A signage zone is proposed at Level 23 of Building 2. The proposed signage zone will be located on the western elevation of the building and has dimensions of 3m (width) x 2m (height).

Details of the proposed signage to be installed within the signage zone will be provided as part of a future development application.

3.9. Subdivision

The SSDA seeks approval for the staged stratum subdivision of the OSD. Preliminary subdivision plans for the WMQ site including the central precinct are included at **Appendix HH**.

3.10. Construction Management

3.10.1. Staging

Construction works for the central precinct will be undertaken alongside the northern precinct development. Works will initially commence within the northern precinct and progress from north-to-south (i.e. works on Building 2 will commence after the start of construction on buildings 1A and 1B in the northern precinct).

Construction will comprise of the following stages:

- Structure
- Scaffold and screens
- Façade installation
- Services and finishes
- Commissioning and testing
- External works (e.g. landscaping)

It is anticipated that construction will take approximately 2.5 years to complete.

3.10.2. Construction Hours

Approval is sought for the following construction hours:

- Monday to Friday: 7am – 6pm
- Saturday: 7.30am – 3.30pm
- Sunday: no works (except as set out below)

There will be times when out of hours works may be required. In addition, approval is sought for the following out of hour activities:

- If required by the Police or a public authority for the delivery or removal of vehicles, plant or materials, or
- In an emergency to avoid the loss of life, damage to property or to prevent environmental harm, or
- If a relevant utility service operator has advised the applicant in writing that carrying out the works and activities would result in a high risk to the operation and integrity of the utility network, or
- Concrete pours or finishing works may finish after 6pm and no later than 10pm on Monday to Friday on a maximum of two occasions per calendar month, or
- Hoist and crane climbing or dismantling between 8am and 5pm on a Sunday for a maximum of two Sundays over the duration of the project where it can be demonstrated that the work cannot be undertaken during the standard construction hours, or
- Internal fit-out and services installations/commissioning up to 24 hours a day (excluding Sunday and public holidays) behind a closed façade capable of achieving a minimum of 30dB(A) noise reduction from the equipment used and subject to the use of the goods lift only.

These out of hour activities are proposed to streamline and shorten the construction program and account for emergency works. The specific works will be relatively quiet activities, such as fit out and crane maintenance, and will not be vibration intensive. These works are necessary to ensure a timely construction program, which will result in less delay and reduce long term community impact. Whilst concrete pours and finishing works are intended to be undertaken inside of the standard hours, it is proposed to permit these

works to occur outside of standard hours but only in the event of unexpected delays, such as weather or emergency situations, to allow the pouring to be completed in one day.

These out of hour works are consistent with the approval for the southern precinct (SSD-10437).

4. Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Environmental Planning and Assessment Act 1979 (EP&A Act)*;
- *Environmental Planning Assessment Regulation 2021 (the Regulations)*;
- *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)*;
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)*;
- *State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)*;
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP)*;
- *State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP)*
- *State Environmental Planning Policy (Housing) 2021 (Housing SEPP)*
- *Sydney Local Environmental Plan 2012 (SLEP)*
- *Biodiversity Conservation Act 2016 (BC Act)*;

Consideration is also required to be given to the following matters:

- *Waterloo Metro Quarter Over Station Development – Concept Application (SSD 9393 as amended and SSD-10441)*
- *Waterloo Metro Quarter Design and Amenity Guideline (March 2020) (Design and Amenity Guideline)*
- *Sydney Development Control Plan 2012 (Sydney DCP)*

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. Statutory Requirements

The following sections provide a summary of the relevant statutory requirements having regard to the *State Significant Development Guidelines*. A detailed statutory compliance table for the project is provided at **Appendix II**.

4.1.1. Power to Grant Approval

The legal pathway under which the consent is sought, why this pathway applies, and the relevant consent authority is outlined in Table 10.

Table 10 Power to Grant Approval

Matter	Consideration
Declaration of SSD	Under Schedule 1 (Clause 19(2)(a)) of the Planning Systems SEPP, development associated with railway infrastructure that has an Estimated Development Cost (EDC) of more than \$30 million is classified as SSD. The proposed development has an estimated EDC of \$112,811,180 (refer Appendix D) and is associated with railway infrastructure. As such the proposal is SSD.
Consent Authority	Under section 4.5 of the EP&A Act, the Minister for Planning and Public Spaces is the consent authority for State significant development.

4.1.2. Permissibility

The permissibility of proposed development is outlined in the table below.

Table 11 Permissibility

Matter	Consideration
Land use(s)	The proposal will comprise co-living housing, community facilities (largely, but not solely, delivered as a child care centre) and retail premises.
Land use zone(s)	The site is zoned MU1 Mixed Use in accordance with the Sydney LEP 2012.
Permissibility	The proposed uses are permitted with consent in the MU1 zone.

4.1.3. Other Approvals

The other approvals required to carry out the project are outlined in the table below.

Table 12 Other Approvals

Matter	Consideration	
Consistent approvals s4.42 of the EP&A Act 1979	Act	Applies (Y/N)
	Fisheries Management Act 1994 (s144)	N
	Coal Mine Subsidence Compensation Act 2017 (s22)	N
	Mining Act 1992 (380A)	N
	Petroleum (Onshore) Act 1991 (s24A)	N
	Protection of the Environment Operations Act 1997 (s43)	N
	Roads Act 1993 (s138)	N
	Pipelines Act 1967	N
Approvals etc. that do not apply	Fisheries Management Act 1994 - -permit under s201,205 or 219	
	Heritage Act 1977 – approval under part 4 or excavation permit under s139	
	National Parks and Wildlife Act 1974 – an Aboriginal Heritage Impact Permit, s90	
	Rural Fires Act 1997 – a bush fire safety authority under s100B	
	Water Management Act 2000 – a water use approval s89, water management work approval s90 or activity approval (other than an aquifer interference approval).	

4.2. Pre-Conditions to Granting Consent

The table below outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 13 Pre-Conditions

Statutory Reference	Pre-Condition	Section in EIS
Resilience and Hazards SEPP	Chapter 4 Remediation of Land: requires the consent authority to be satisfied that the land is suitable in its current state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.	Satisfied under the CSSI and basement

Statutory Reference	Pre-Condition	Section in EIS
	The proposed development is subject to the approved CSSI remediation strategy. Remediation will be carried out in accordance with the relevant conditions of the CSSI approval and approved basement SSDA. Remediation works is not required or proposed under this SSD. Nevertheless, subject to completion of remediation works, the proposal is suitable for the site	SSD approval.
EP&A Act – Section 4.24 Concept Development Consent	A concept development consent applies to the site. Determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site. This SSDA has been submitted concurrently with a second amending concept DA. The proposed development for the central precinct is fully consistent with the concept approval as proposed to be amended.	Appendix LL details this SSD's consistency with the Concept Approval (as amended)
SEPP (Transport and Infrastructure) 2021	Clause 2.98 relates to development that is in or adjacent to a rail corridor. The consent authority must give written notice of the application to the rail authority for the rail corridor and take into consideration any response to the notice. Clause 2.119 relates to development with frontage to a classified road. The consent authority must not grant consent to development unless it is satisfied that where practicable and safe, vehicular access is provided by a road other than a classified road and that the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development. Section 2.122 requires the consent authority to refer 'traffic generating development' to Transport for NSW and take into consideration any response received from Transport for NSW. The Section also requires the consent authority to consider the accessibility of the site and any potential safety, road congestion or parking implications of the development. A noise and vibration impact assessment (NVIA) has been prepared and is enclosed in Appendix T. The NVIA considers the noise and vibration impacts arising from Botany Road and the Sydney Metro tunnels on the amenity of future occupants of Building 2. It concludes that subject to the implementation of the specified mitigation measures, the proposed development is acceptable from a noise and vibration impact perspective.	Section 6

Statutory Reference	Pre-Condition	Section in EIS
	The proposed development comprises traffic generating development as it incorporates more than 75 co-living accommodation units and the site has access to a classified road. A Transport, Traffic and Parking Impact Assessment (TIA) has been prepared by PTC and is enclosed in Appendix R. The assessment concludes that the proposed development will not have any detrimental impact on the road network. Sydney Metro and TfNSW will be notified of this application as part of the public exhibition process.	
City of Sydney LEP 2012 Clause 6.45 site specific provisions	In accordance with Clause 6.45, the consent authority must not consent to development on land at the Waterloo Metro Quarter unless it is satisfied that the development is consistent with the following objectives: ▪ 12,000 sqm of GFA below podium for land uses other than residential accommodation or passenger transport facilities. ▪ 2,000 sqm of GFA for the purpose of community facilities. ▪ 2,200 sqm of land for publicly accessible open space. For the purposes of calculating GFA and satisfying Clause 6.45, a 'whole of precinct' approach has been adopted whereby consideration has been given to the provision of the above land uses across the northern precinct, southern precinct and central precinct. Further, the consent authority must not consent to the construction of one or more dwellings on land at the Waterloo Metro Quarter unless: ▪ It is satisfied that at least 5% of the GFA used affordable housing. ▪ It is satisfied that no dwelling used for the purposes of affordable housing will have a GFA less than 50 square metres. ▪ It is satisfied that land uses other than residential accommodation or passenger transport facilities will be evenly distributed throughout. A discussion of each of these matters is provided below. Non-residential GFA (Clause 6.45 (1) (a)) Across the overall Site, including the approved southern precinct, the total amount of non-residential GFA at or below the	Appendix MM

Statutory Reference	Pre-Condition	Section in EIS
	podium is 10,658sqm, this represents a shortfall of 1,342 sqm and a 11.1% departure. The underlying purpose of Clause 6.45(1)(a) was to secure a significant quantum of non-residential GFA in the Waterloo Metro Quarter to support activation and employment. However, the control was introduced in 2019, prior to the COVID-19 pandemic, and was based on market assumptions that have since shifted materially. As demonstrated in the Economic Needs Assessment (Urbis, 2025), the scale of commercial office previously contemplated is no longer viable in this location, with modelling showing only 4,940sqm of office demand likely by FY35. Accordingly, the standard was implemented at a time when there was much stronger demand for commercial office floor space. In this context, the strict application of the control has become effectively redundant: it seeks an outcome that cannot be reasonably delivered or sustained by the market. The amended scheme (primarily due to the change of land use with within the northern precinct) ensures that the broader mixed-use and activation objectives of the zone are still met through a balanced combination of retail, community, childcare and commercial space, alongside significant housing outcomes. A clause 4.6 variation request has been prepared to justify for the shortfall. The proposal maintains more than 10,650 sqm of non-residential GFA across retail, childcare, community facilities and commercial office podium uses, ensuring a broad mix of employment-generating activities within the precinct. Community facilities (Clause 6.45 (1) (b)) Approximately 2,330 m² of GFA for community facilities is proposed within the central precinct (Building 2), which exceeds the minimum required by Clause 6.45(2)(b). Publicly accessible open space (Clause 6.45 (1) (c)) In accordance with Clause 6.45, 2,200sqm of land is to be used for publicly accessible open space across the broader WMQ site. Cope Street Plaza which will be delivered under the approved southern precinct SSD comprises approximately	

Statutory Reference	Pre-Condition	Section in EIS
	1,341sqm of the total publicly accessible open space. The balance of the public open space will be located within Raglan Street as proposed under the northern precinct, the new Grit Square, Church Square and extension of Cope Street Plaza as proposed under this SSD. The total area of publicly accessible open space will be greater than 2,200sqm. Affordable Housing (Clause 6.45 (2) (a), (b)) The consent authority must not consent to the construction of one or more dwellings on land at the Waterloo Metro Quarter unless: ▪ It is satisfied that at least 5% of the GFA is used to provide affordable housing. ▪ It is satisfied that no dwelling used for the purposes of affordable housing will have a GFA less than 50 square metres. Affordable housing will be delivered in the northern precinct. All affordable housing apartments will have a GFA greater than 50sqm. The approved southern precinct development has delivered 70 social housing apartments, which will positively contribute to the diversity of housing stock across the WMQ. Distribution of Non-residential land uses (Clause 6.45 (2) (c)) The broader WMQ development satisfies Clause 6.45 (2) (c) by delivering a diverse mix of non-residential uses across the precinct to activate public domain areas whilst integrating with Waterloo Station. The proposed development contributes to this mix by delivering a non-residential podium, with ground floor retail, community facilities and a childcare centre within the podium. These uses have been located at ground level to activate the precinct throughout the day and evening whilst also managing impacts from potential noise from Botany Road and a highly trafficked public domain.	

4.3. Mandatory Considerations

The table below outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 14 Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulations		
Section 1.3	The relevant objectives are ▪ <i>To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i> ▪ <i>To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i> ▪ <i>To promote the orderly and economic use and development of land</i> ▪ <i>To promote the delivery and maintenance of affordable housing,</i> ▪ <i>To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i> ▪ <i>To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i> ▪ <i>To promote good design and amenity of the built environment,</i> ▪ <i>To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i> ▪ <i>To promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i> ▪ <i>To provide increased opportunity for community participation in environmental planning and assessment.</i> The proposal will promote the social and economic welfare of the community through the delivery of an integrated transport-oriented development above the Waterloo metro station. The proposal is committed to achieving high standards of ecologically sustainable development as outlined in the ESD report (Appendix Q).	Appendix II
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include; ▪ Planning Systems SEPP ▪ Resilience and Hazards SEPP ▪ Transport and Infrastructure SEPP ▪ Sustainable Buildings SEPP ▪ Biodiversity and Conservation SEPP ▪ Industry and Employment SEPP ▪ Housing SEPP ▪ Sydney LEP	Appendix II

Statutory Reference	Mandatory Consideration	Section in EIS
	In accordance with the SEPPs, the site can be made suitable for the proposed use and a number of ESD principles are proposed as part of the project.	
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	There are no draft EPIs relevant to the site or proposal.	N/A
Section 4.15 (1)(a)(iii) Relevant development control plan	In accordance with clause 2.10 of the Planning System SEPP, the provisions of Sydney Development Control Plan 2012 (SDCP 2012) do not apply to this development, unless it is specified under the Concept Condition of Consent, which has been addressed separately.	N/A
Section 4.15 (1)(a)(iiiia) any planning agreement or draft planning agreement	None relevant to the proposed development.	N/A
Section 4.15 (1)(a)(iv) relevant matters prescribed by the Regulations.	The EIS will be prepared in a form consistent with the requirements of Section 190 of the EP&A Regulations. In accordance with Section 193 of the EP&A Regulations, an assessment of ESD will be provided with the EIS.	Section 6 and Section 7
Section 4.15(1)(b) the likely impacts of that development,	The likely impacts of the development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 6 and Section 7
Section 4.15(1)(c)	The suitability of the site for the development	Section 7
Section 4.15(1)(d)	Any submissions made in accordance with the Act or regulations	Section 7
Section 4.15(1)(2)	The Public Interest	Section 7
Section 4.24	Sets out the provisions for concept approval which will need to be considered for the concept component of the SSDA and any subsequent DA.	Appendix LL details this SSD's consistency with the Concept Approval (as amended)
Mandatory relevant considerations under EPIs		
State Environmental Planning Policy (Transport and Infrastructure) 2021	Part 2 Infrastructure Section 2.98 – Development adjacent to rail corridors Section 2.120 – Impact of road noise or vibration on non-road development. Section 2.122 – Traffic-generating development.	Section 6 and Appendix NN

Statutory Reference	Mandatory Consideration	Section in EIS
	Section 2.119 – Development with frontage to a classified road.	
	Part 3.3 Early education and care facilities—specific development controls A consent authority must take into consideration the DPHI Child Care Planning Guideline 2017 (the Childcare Guideline) when assessing a DA for a childcare facility. Part 3 of the Childcare Guideline includes matters which must be considered by the consent authority when assessing a DA for a childcare facility. Part 4 of the Childcare Guidelines provides the requirements for internal and external areas of Childcare facilities as per the National Quality Framework (NQF). It is noted that the Childcare Guidelines take precedence over the City of Sydney Development Control Plan (DCP), except for controls relating to car parking rates. Under this SSDA development consent is sought for the use and general location of the childcare centre for 131 children (based on test fit of the proposed floor plan). The fit-out and operational details shall be the subject of a future DA. Detailed assessment against Part 3 and Part 4 of the Childcare Guidelines will be undertaken as part of the future childcare fit-out DA. Notwithstanding, Part 3 'Matters for Consideration' and Part 4 'Applying the National Regulations to development proposals' have been considered when designing the podium levels, to ensure a high quality and compliant childcare centre can be accommodated in the future	
State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)	All signage will be required to consider the Schedule 5 criteria under the Industry & Employment SEPP. The proposed signage zone at on the western elevation of the building will be assessed under the SEPP.	Appendix II
State Environmental Planning Policy (Sustainable Buildings)	Chapter 2 Standards for residential development–BASIX. Co-Living Housing does <u>not</u> require a BASIX certificate, because the definition of BASIX building (Sch 7 of the EP&A Regulation) <u>excludes</u> “a boarding house, hostel or co-living housing that accommodates more than 12 residents or has a GFA exceeding 300sqm”. Chapter 3 Standards for non-residential development Clause 3.2 of the SEPP contains ESD considerations for non-residential development, which applies to the non-residential component of the proposal. The provisions under clause 3.2(1) of the	N/A
		Appendix Q

Statutory Reference	Mandatory Consideration	Section in EIS
	SEPP has been considered and assessed as part of the Ecologically Sustainable Development Report and Sustainability Strategy.	
State Environmental Planning Policy (Housing) 2021	Clause 1.9 of the SLEP 2012 specifies that certain parts of the Housing SEPP do not apply to the WMQ site. This includes: Chapter 3 Part 3 Co-living housing Exclusion from the SEPP does <u>not</u> prevent consent from being granted to these types of development at WMQ, as the land uses do not rely on the SEPP for permissibility. The provisions contained in Chapter 3 Part 3 of the Housing SEPP such as development standards, and non-discretionary ('shall not refuse') development standards, do not apply to WMQ. The EIS will reference the provisions of the SEPP for benchmarking purposes. The design principles of the ADG do not apply to Co-living housing. The exception is the building separation provisions of the ADG, which are called up in Chapter 3 Part 3 of the Housing SEPP. However, because Chapter 3 Part 3 do not apply to WMQ, building separation provision also do not apply. Despite this, the EIS will reference the SEPP requirements to benchmark the Co-living proposal.	Appendix II
Considerations under other legislation		
Biodiversity Conservation Act 2016 Part 7 and Part 8 (2) (BC Act)	Under section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act), SSD applications are to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. A BDAR waiver has been obtained (dated 15th September 2025). Accordingly, a BDAR is not required as part of the SSDA.	Appendix EE
Federal Airports Act 1996	An airspace height approval for the building development as a Controlled Activity under the Airports (Protection of Airspace) Regulations 1996 (APAR) has been granted for the overall WMQ Site. The approval was granted on 20 February 2019 (File Reference: F18/1442-86) for maximum approved height of 116.9m AHD. Given the proposed maximum height for the central precinct is below the approved height, the current approval remains valid and it is not required to obtain a separate approval.	N/A
Roads Act 1993	The Guide for Traffic Generating Developments will be considered as part of the Transport, Traffic and Parking Impact Assessment and assessed within the EIS.	Section 6 and Appendix R
Development Control Plan		

Statutory Reference	Mandatory Consideration	Section in EIS
Waterloo Metro Quarter Design and Amenity Guideline (March 2020)	The detailed SSDA application is required to demonstrate that the proposed development is generally consistent with the objectives and design criteria of the Waterloo Design and Amenity Guideline. Where it is not possible to satisfy the design criteria, the detailed SSDA is required to demonstrate how the objective has been achieved.	Section 6
Sydney Development Control Plan 2012	Clause 2.10(1) of the Planning Systems SEPP provides that the provisions of Development Control Plans do not apply to SSD.	N/A
Concept Approval		
Concept Approval – SSD 9393 as amended by SSD 10441	Consistency of the project with the concept approval	Appendix LL details this SSD's consistency with the Concept Approval (as amended)

4.4. Contributions

4.4.1. City of Sydney Development Contributions Plan 2015

The OSD is subject to the City of Sydney Council's contributions requirements under the *City of Sydney Development Contributions Plan 2015 (Contributions Plan)*. The levy aims to support the delivery of public amenities, open spaces, transport infrastructure and other community services required to meet the needs of a growing population and ensure sustainable urban development.

The current contribution rates for the southern precinct (as of July 2025) are as follows:

- \$5,817 per worker
- \$13,456 per visitor
- \$15,434 per resident

It is important to note that the proposed non-profit child care centre can be excluded from the contribution payment in accordance with section 1.3 of the Contribution Plan.

A contribution will be conditioned and paid prior to obtaining construction certificate.

4.4.2. City of Sydney affordable housing program

The City of Sydney Affordable Housing Program 2023 (AH Program) provides the requirements and operational detail for various affordable housing contribution provisions in local environmental plans operating in the City of Sydney local area.

The site sits within the "residual land" area under the AH Program, which is subject to the following affordable housing levy contribution:

- 3% of the total floor area of the development that is intended to be used for residential purposes, and
- 1% of the total floor area of the development that is not intended to be used for residential purposes.

However, the site is subject to clause 6.45 2(a) and (b) of the LEP, which already requires 5% of residential GFA to be provided as affordable housing. This site specific provision formed part of the rezoning for the Waterloo Metro Quarter site, which predates the application of the AH Program 2023. Accordingly, the site

specific provision under the LEP provides a higher affordable housing contribution than the AH Program, which the proposed development satisfies.

Therefore, the proposed development satisfies the volume of affordable housing contribution under the AH Program and clause 6.45 2(a) and (b) through the delivery of 5% of residential GFA being provided as affordable housing.

4.4.3. State Housing and Productivity Contribution

The Housing and Productivity Contribution replaces the previous Special Infrastructure Contribution (SIC) in the NSW planning legislation and is a fair and consistent development charge that will help fund the delivery of infrastructure.

For the proposed development, the following indexed rates applies (as of 1 July 2025):

- Commercial development: \$32.35 per sqm of new GFA

A contribution will be conditioned and paid prior to obtaining construction certificate

5. Community Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

5.1. Engagement Carried Out

Engagement has been undertaken in accordance with DPHI's *Undertaking Engagement Guidelines for State Significant Projects*. Consultation was undertaken with the local community, government agencies and First Nations stakeholders including:

- Local residents that have been impacted by ongoing construction disruptions in the area as well as key precincts (South Eveleigh), businesses and landowners.
- Broader local businesses, organisations and clubs, local community advocacy and action groups, schools.
- Federal and State Members
- City of Sydney Council staff
- NSW Department of Planning, Housing and Infrastructure
- Government Architect NSW
- Other NSW government agencies and authorities including:
 - Sydney Metro
 - Homes NSW
 - NSW Police
- First Nations stakeholders and organisations (including Metro LALC and community members)
- Service and utilities providers - Ausgrid

The following engagement activities were undertaken to inform and consult the community on the proposed development:

- A project notification letter and Social Impact Assessment (SIA) survey was distributed on 22 August 2025 to 3,650 residents and businesses in the area surrounding the site. The newsletter provided information about the proposal, and invited feedback via the SIA survey, 1800 number or enquiry email.
- Fourteen (14) direct emails to key community stakeholders were issued on 20 August 2025.
- A one-hour information session was held in-person and online on 1 September 2025 for community stakeholders to learn about the overall Project, provide feedback and ask questions. The presentation provided an overview of the proposed development, planning process, design overview and site consideration and was followed by a Question-and-Answer session. Eleven (11) people attended the information session.
- A 1.5-hour webinar was held on 3 September 2025 for community members. The webinar included an overview of the proposed development, planning process, design overview and site considerations and was followed by a Question-and-Answer session. Fourteen (14) people attended the webinar.
- Six briefing sessions were held with Government agencies and authorities including DPHI, GANSW and City of Sydney, including four SDRP sessions.
- Maintained existing Project enquiry 1800 number (1800 171 386) and established a new email address (waterloo.community@jhg.com.au) and enquiry database for community members and stakeholders, and monitored and responded to enquiries up until lodgement.

5.2. Community Views

A summary of the key community views in relation to the proposed development is included below. A detailed breakdown of community views is included at **Appendix DD**.

Table 15 Overview of community engagement

Key theme	Detail
Building height	Questions were received relating to building heights, including whether they will exceed the previously approved building envelopes, and the final proposed building heights
Design	Questions were received about design excellence, with reference to the exterior and interior design and the co-living model – how it will operate in practice and be managed.
Co-living and student housing	Clarification requested regarding the distinction between co-living and student housing. A question was also received around the management mechanism for the co-living building.
Parking	Questions were received about the provision of car parking, including the number of basement spaces and their proportion to total dwellings.
Pedestrian connectivity	Questions were received about pedestrian and cycling connections, including dedicated bike paths and walking routes to the Metro.
Ancillary uses	Questions were received about recreational and community facilities, including how community spaces will be provided, managed, and protected from privatisation.
Retail mix	Questions were received about the type of retail and food businesses to be delivered, including whether a supermarket or small-scale grocer is planned.
Solar impacts	Questions were received about overshadowing, including studies of Alexandria Park and surrounding residential streets.
Public domain and management	Comment received noting that the plaza was previously expected to be delivered in September, but is now anticipated for mid-next year, and seeking clarification on whether this represents a delay. A comment was also received noting that the public domain was initially to be managed by Mirvac with an ongoing presence in the building and seeking clarification on how Mirvac will manage the open spaces and retail areas
Transition housing	A comment was received welcoming the inclusion of a broader cohort of residents in the development, with support expressed for incorporating transition housing. Feedback suggested this location could be well suited if an appropriate mechanism for onsite support were in place.
Housing typology and mix	Request for greater clarity regarding the distinction between affordable housing, co-living, and student housing, and comment that this could influence the outcomes of the Social Impact Assessment, as community perceptions of the housing mix are likely to shape survey responses. A request for clarity was also received on the apartment breakdown within the commercial residential building (northern precinct), including whether 3- bedroom dwellings are provided for families or if the mix is primarily 1–2 bedroom units.
Construction impacts	Questions were received about managing construction noise and disruption, coordination with nearby projects, and restrictions on afterhours works. A comment was also received about remuneration/vouchers not adequately covering the cost of construction impacts, with a resident noting that many housemates have moved out due to noise and disruption, leaving remaining tenants to cover higher rent. Additionally, a question was received about receiving a dilapidation report ahead of the next phase of construction commencing.
Planning process and context	A question was received about the extent to which the proposal is consistent with the established goals of the Waterloo-Botany commercial corridor. A comment was also made that that Council originally identified Botany Road as a commercial corridor, but the proposal now focuses on apartments. Comment that there is already an oversupply of apartments and limited other uses. Additionally, a question was received about the DPHI statutory exhibition period and request for the public exhibition period to be 28 days.

Key theme	Detail
Engagement	Questions were received about the approach to community engagement, including opportunities for participation during webinars and access to presentations. Questions were also received about opportunities to provide feedback, including availability of SIA survey and close date.

5.3. Engagement to be Carried Out

The Applicant will continue to keep stakeholders and the community informed of the approval process through the exhibition and determination phases by:

- Ongoing project milestone communications, such as following SSDA lodgement and notification of public exhibition, and ongoing planning approvals processes as the project progresses. This should continue via established communications channels such as the Waterloo Metro Quarter project EDM database.
- Continued engagement with existing and any newly identified stakeholders who did not provide any pre-lodgement feedback, should interest arise during the public exhibition period.
- Maintain dedicated community relations contact during construction (should the SSDAs be approved), for residents and stakeholders to provide feedback, ask questions and raise any concerns regarding site works. This would be opportune to demonstrate an ongoing commitment to working with neighbours to manage construction-related impacts.

6. Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts.

Detailed tables have been provided within the appendices as outlined in the table below. This information includes a reference to where these matters have been addressed in the EIS.

Table 16 Key Appendices

Key Appendix	Reference
SEARs compliance table	Appendix A
Statutory compliance table	Appendix II
Proposed mitigation measures table	Appendix JJ

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. Design Quality

6.1.1. Design Excellence and integrity

An updated Design Excellence Strategy (**DES**) (**Appendix B**) has been prepared by Urbis to establish the framework to deliver design excellence for the second amending concept plan and the northern and central precinct detailed designs. The updated DES is based upon the Sydney Metro City and South West Design Excellence Strategy (November 2018) for consistency and continuity purposes and has been updated specifically for the revised schemes proposed for the WMQ central and northern precincts.

The conditions of the concept approval require a design integrity process to operate throughout the design development. The updated DES provides for an independent design review process by the State Design Review Panel (**SDRP**), comprising three panellists from the original Sydney Metro Design Review Panel including a representative of NSW Government Architects Office, City of Sydney Council and a panellist appointed by Sydney Metro. Under the updated DES, the SDRP will review and provide advice on the proposal up to four times prior to the lodgement of the detailed SSDA.

In accordance with this requirement, the SDRP reviewed the proposal four times and provided holistic advice for the precinct and detailed comments on the central precinct's design. A Design Integrity Report (**DIR**) has been prepared by Urbis (**Appendix C**) to document this process and demonstrate how the SDRP's comments have been addressed

The SDRP expressed support for a number of key elements within the central precinct including:

- The increased separation distance between Building 1B and Building 2.
- The planning of Building 2 as a cluster of volumes and the reduction of west-facing units, creating a more successful building form and a higher level of amenity for residents.
- The improvements to the scheme at the ground plane, including the relationship of the Building 2 podium to the existing church and the development of Grit Lane.
- The ongoing engagement and co-design process with local knowledge holders and community.
- The improvements to window/wall ratios and facade shading.
- The increased setback to Building 2 and provision of a wider footpath along Botany Road.
- The reduction to the rooftop plant of Building 2 and improvements to the overshadowing of Alexandria Park.
- The finer grain approach to the tower facades of Building 2.

- Providing additional windows to allow the corner units of Building 2 to be dual aspect.

The SDRP also raised comments to be addressed prior to the submission of the detailed SSDA for the central precinct which are outlined in the table below:

Table 17 Design Response to SDRP 4 comments

Summarised SDRP comment	Design Response
Demonstrate that the path adjacent to the western façade of Building 2 can provide accessible access between Grit Lane and the ramp adjacent to the Waterloo Congregational Church	The path proposed along the western façade of Building 2 complies with accessibility requirements
Ensure that the serviceability of the retail offerings is considered during design development. For example, access to shared amenities, ventilation requirements and kitchen exhausts	Amenities for staff and visitors of the proposed retail tenancies will be accessed via the western façade of the building. End of trip facilities are located in the shared basement. Louvres are integrated within the retail glazing system to allow flexibility in future fit-outs. Kitchen exhausts are capable of being provided to all future retail tenancies.
Ensure window reveals are deep and consistent with the design approach for the façade orientation	East and west-facing windows are designed with 300mm deep horizontal and vertical sunshades
Ensure dual aspect windows are operable to utilise opportunities for cross ventilation	Dual aspect corner units will include an operable window.
Consider integrating blinds within awning windows so that natural ventilation can be achieved while minimising solar gain and retaining privacy	Conventional dual shade roller blinds will be provided for each unit.
Provide detail on the metal cladding profiles and ensure that the profile depth/play of shadow provides the necessary level of contrast and visual interest	Details of the proposed metal cladding is provided within the accompanying Design Report (Appendix F)
Sufficiently angle the horizontal shading to discourage birds perching or nesting	Horizontal sun shades will be splayed to discourage birds perching or nesting
Further consider how to connect the tile base with the perforated brick screens above	The Design Report (Appendix F) demonstrates the relationship between the different materials proposed on the podium and at upper levels of Building 2. A range of high quality materials and finishes are proposed, which respond to the site's context and will provide visual interest within the site.
Provide detailed façade drawings that describe the relationship and junctions between the different materials and wall planes	
Ensure the proposed glazed tile is of a high quality and provide samples.	

6.2. Built Form and Urban Design

The proposed building will contain a three (3) storey (ground floor + 2) podium with a twenty-three (23) storey (including plant level) tower above. High quality public domain and pedestrian thoroughfares enhancing east-west and north-south permeability within the Waterloo Metro Quarter will be provided at ground floor level.

Overall, the proposed development seeks to enhance permeability across the WMQ and provide an appropriate built form response to the site's context. This is achieved by:

- high quality and creation of new generous public domain, including creation of a new Grit Square, extended Cope Street Plaza, Church Square that complements and enhances the surrounding public spaces.
- high quality pedestrian walkways, which will enhance east-west and north-south connectivity and create direct connections from Botany Road (including the future bus interchange) to the Waterloo metro station as well as from the southern precinct to the northern precinct (via Raglan Walk).
- a transition of height and scale between southern and northern precincts, with articulated tower form to break up the grouping of tower mass within the overall site.
- appropriate separation distances between existing and proposed development adjoining the site. The proposed separation distances will support a high quality built form on site that is distinct from development to the north and a high level of amenity for future residents.

A detailed assessment is provided below.

6.2.1. Height, bulk and scale

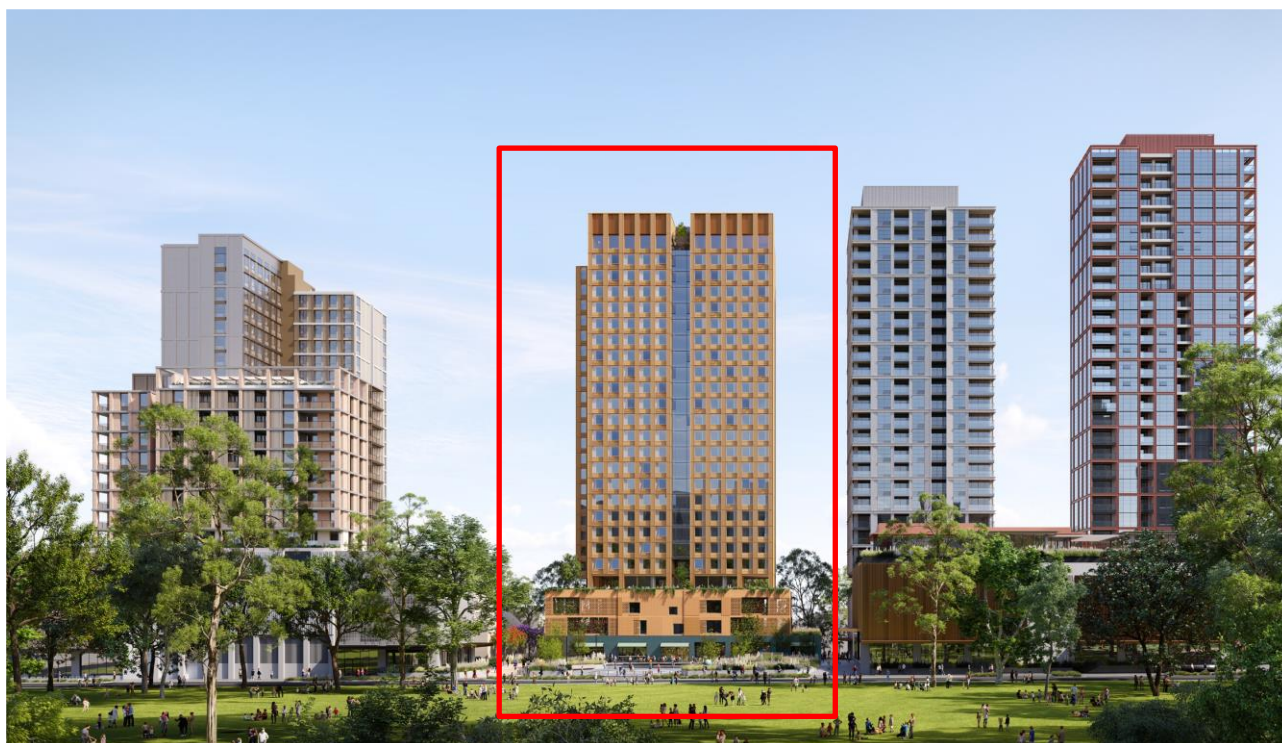
The height, bulk and scale of Building 2 is consistent with the building envelope proposed within the amending concept DA. The building will have a maximum height of RL 99.65 (i.e. 82.85m), which complies with the maximum height control (RL 104.2) for the site established within the Sydney LEP 2012 and does not exceed the obstacle limitation surface.

The proposed building height reflects the development's role as a focal point for the surrounding area and seeks to respond to the desired outcomes for the WMQ, which include creating an urban environment that drives high usage of the Sydney Metro network responding directly to the principle of transit oriented development.

A holistic massing approach is proposed across the WMQ site, including Building 2. This ensures that the buildings appear as a cohesive development that appropriately respond to the site's context. As shown in the figure below, Building 2 provides a transition of scale from the constructed southern building and the taller towers within the northern precinct. The Building 2 tower form is also an elongated tower form with a recessed horizontal band to break up the tower width and add articulation.

The tower floor plates (excluding Level 24) range from 543.8 sqm to 667.2 sqm in area, which is significantly less than the maximum permitted floorplate size (900 sqm) in the Waterloo Design and Amenity Guideline and contributes to a slender and well-considered built form.

Figure 21 The built forms within the precinct (Building 2 outlined in red)



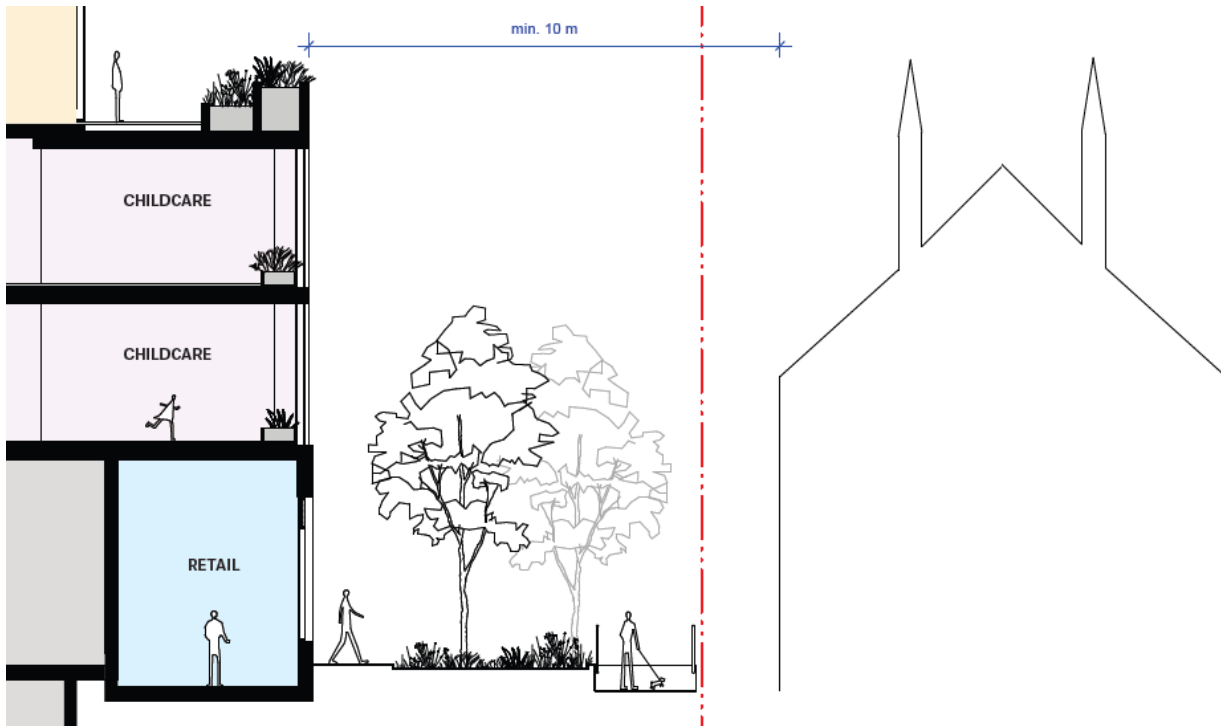
Source: *Bates Smart* (2025)

The proposed podium and tower sensitively responds to the height, proportion, scale and architecture of the adjacent Waterloo Congregational Church. As shown in the figures below this has been achieved by:

- The inclusion of a recessed ground floor level in the south west corner of the site, which will ensure improved view corridor through Church Square.
- The proposed ground floor setback is aligned to the front setback of the church along Botany Road (10m), which will minimise the visual bulk and dominance of the ground floor when viewed from Botany Road.
- Even though Level 1 of the podium is forward of the setback line from Botany Road, the cut out of the south-western corner of the podium opens up view corridors towards the Church along Botany Road by providing a line of sight. This cut out in the floor plate also continues within the tower to enhance sky view into the site.
- The glass line of the tower is setback 10m from Botany Road to retain sightline to the Church. Minor architectural features encroach into this backline, which will not have a material impact to the visual amenity of the Church.
- The height of the podium (12.6m) corresponds with the top of the church providing an appropriate transition between the two sites.
- Most of the proposed podium will be setback 10 metres from the Waterloo Congregational Church to the south of the site, consistent with the design criteria in Part 3J of the Waterloo Design and Amenity Guideline. A reduced setback is proposed for a small part in the south-east corner of the site given the existing alignment of the church building. Notwithstanding, visibility of the rear part of the church is very limited from Botany Road and the church will continue to appear as a freestanding and independent building. The minor variation will not hinder the delivery of a high quality public open space at the south of the site.
- The tower is setback thirteen (13) metre form the church respectively, which provides sufficient physical separation distance.

Together these measures will protect the significance of the church within the local streetscape by maintaining a view corridor to the church and provide sufficient curtilage to ensure that both buildings appear as separate and distinct built forms.

Figure 22 Podium relationship with Waterloo Congregational Church



Source: Bates Smart (2025)

Figure 23 Relationship with Waterloo Congregational Church



Source: Bates Smart (2025)

Overall, the bulk and scale of the proposed development is appropriate because it will:

- Provide a built form that provides a gentle transition and harmonious relationship between the WMQ developments
- Improve the view corridor through Church Square as viewed from southeast
- Provide physical separation between the Church that creates a curtilage and respect the heritage importance of Waterloo Congregational Church
- The ground floor setback is aligned with the Church along Botany Road.
- The cutout to the south-western corner of the podium and tower allows view corridor to the Church from Botany Road and improves view to sky.
- The above-podium setbacks and articulation of the tower form will minimise the perceived bulk and scale of the proposed development and provide visual interest within the site.
- The slight encroachment of the tower setback along Botany Road relates to architectural features, which will not add perceivable bulk or scale to the site.

6.2.2. Podium and tower setbacks to northern precinct

Separation distances are proposed between Building 2 and Building 1B (northern precinct) as shown in the figures below.

A range of setbacks are proposed within the site to enhance visual relationship and ensure adequate amenity is achieved between the central and northern buildings.

A generous 6 metre wide thoroughfare (Grit Lane) will be provided between the north of the central precinct and south of the northern precinct, which is consistent with the Waterloo Design and Amenity Guideline and will facilitate the delivery of Grit Lane. The podium setback is further increased to 20m towards the north-western part of the site, which will enable the creation of a new public plaza – Grit Square. The increased separation distance will also create visual break between the two podium form and enable a view corridor through the site from Botany Road.

The northern elevation of the tower component will be setback between 15 metres to 26.3 metres from Building 1B. The proposed 15 metres separation distance relates to approximately two thirds of the elevation.

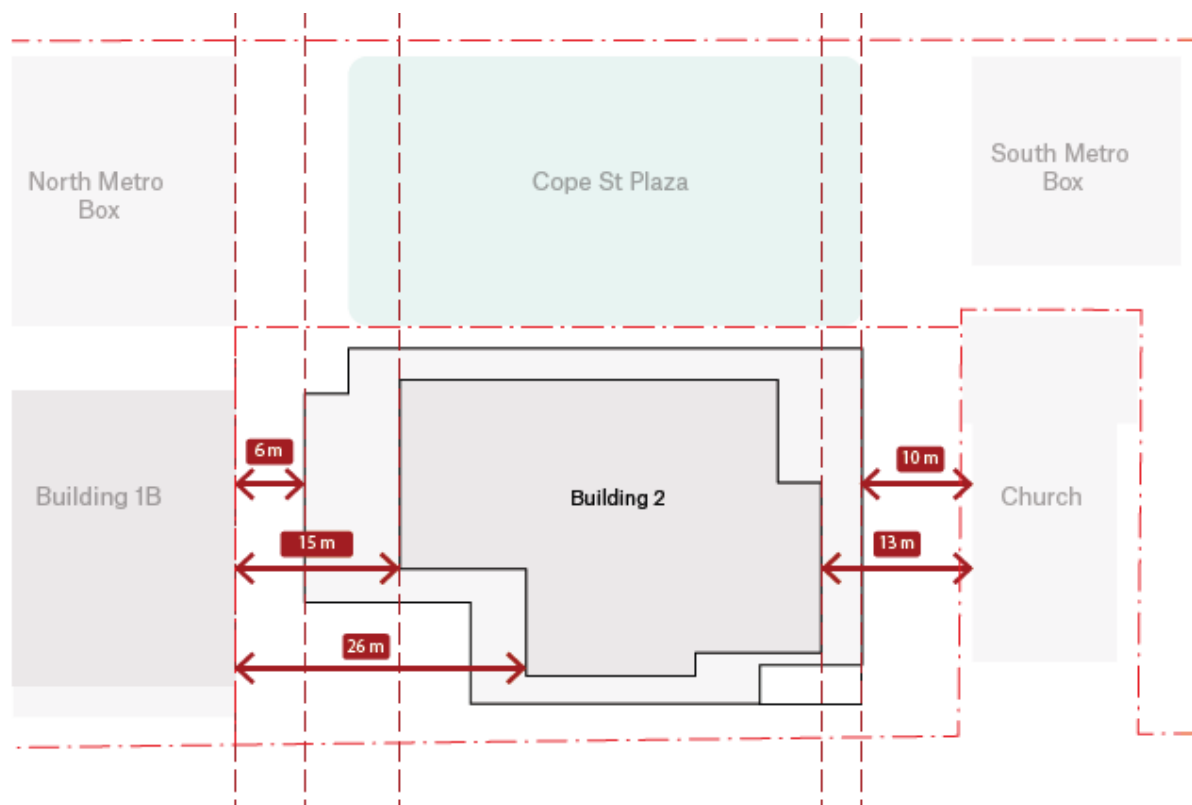
Part 2F of the Apartment Design Guide requires an 18m separation distance between habitable rooms located at Levels 4 to 8 and a 24m separation distance between any levels above. Accordingly, a variation to the ADG is proposed.

The proposed variation has been discussed and endorsed as part of the SDRP process and will enable the development potential of this well located site to be fully optimised. The extent of the northern elevation located closest to Building 1B will contain very limited glazing (windows will be limited to the internal corridors only). These windows are not related to habitable room windows which will minimise opportunities for overlooking. Accordingly, the proposed development will result in minimal privacy impacts despite the proposed non-compliance.

The scale and form of the central precinct development is fully compatible with that envisaged for the Waterloo Metro Quarter and fully appropriate for the site's setting. Both Building 2 and Building 1B to the north will appear as separate and distinct built form with their own distinct identity that individually contribute to the character of the area and skyline. The large above-podium setback / recess will minimise the bulk of the building when viewed from the west and north of the site.

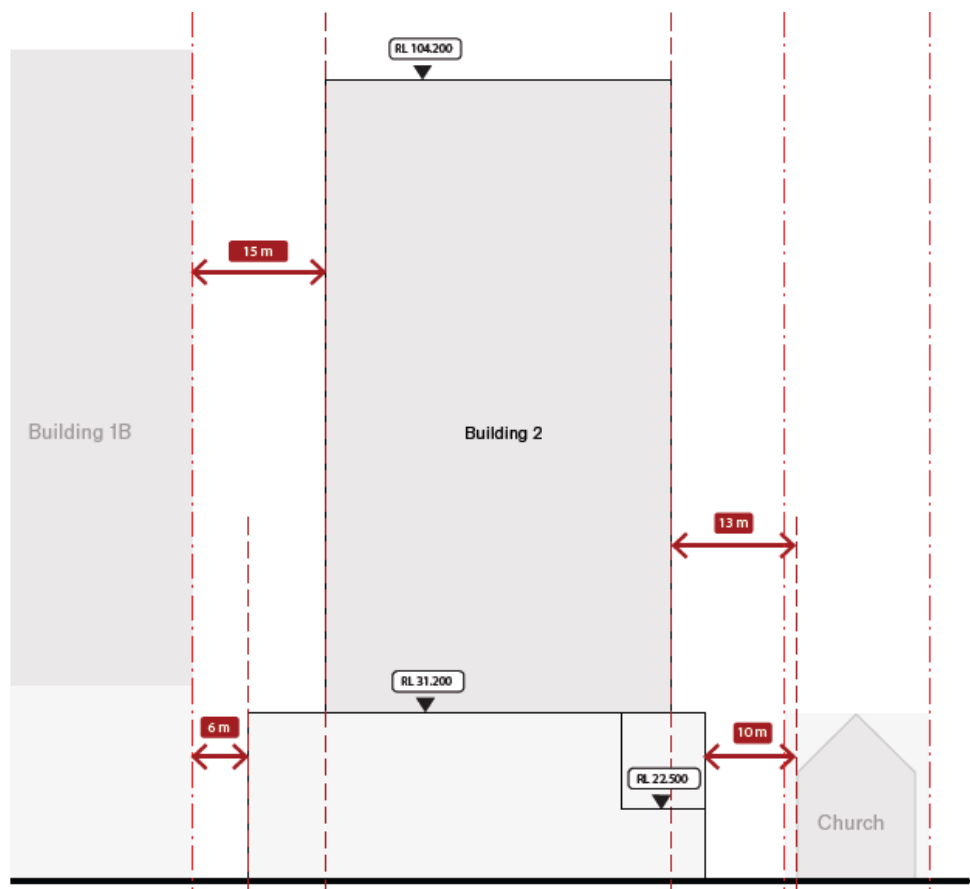
Accordingly, notwithstanding the variation, the proposed development will be fully compliant with the objectives of Part 2F of the ADG.

Figure 24 Proposed podium and tower setbacks to north and south (plan)



Source: Bates Smart (2025)

Figure 25 Proposed podium and tower setbacks to north and south (section)



Source: Bates Smart (2025)

6.2.3. Public domain interface and creation of new publicly accessible areas

The site forms part of the wider WMQ site and shares an interface with several areas of public domain as well as other buildings and the surrounding street network. More importantly, the proposal is also able to create new public open space areas through reduced ground footprint compared to the previously approved development.

In total 2,248 square metres of public domain will be provided within WMQ, which will exceed the minimum 2,200 square metre requirement established in Part 3C of the Waterloo Design and Amenity Guideline and clause 6.45(c) of the Sydney LEP 2012.

The proposed development has been designed to seamlessly integrate with the central precinct's surroundings as follows:

Cope Street Plaza

Cope Street Plaza comprises a high quality area of open space to the east of the central precinct. It will provide a key communal space near to the entrance of the Waterloo metro station. It has a direct interface with Building 2.

The proposal will create a new extension to the Plaza by incorporating a setback to the north-eastern portion of the ground plane. The proposed setback will create a large area of publicly accessible space and opportunities for outdoor dining.

To maximise activation to Cope Street Plaza, retail and community uses are located along the eastern elevation of Building 2. These tenancies will have associated outdoor seating and glazed facades designed to maximise overlooking to the plaza and enhance the vibrancy of the area. The development will appear as a high quality and contemporary building when viewed from Cope Street Plaza.

An approximate 1.2 metre level difference is proposed between the eastern part of the central precinct and Cope Street Plaza. Stepped and ramped access from Cope Street Plaza to the central precinct will be provided as part of the CSSI approval.

Brick paving is proposed within the central precinct public domain, which has been carefully selected to create a cohesive connection with the broader precinct.

Botany Road

The proposed development will seamlessly integrate with Botany Road to the west of the site. As part of design development, the building setback has been increased to the western boundary to provide a wide footpath along Botany Road. Buffer planting and street trees are proposed along the entire length of the western boundary to enhance the amenity of this key interface and soften the appearance of the built form.

The street level will be located at approximately 0.7m – 1m below the finished floor level of the ground floor within Building 2 to mitigate flood constraints. Stepped access will therefore be provided from the street level in the south western corner of the site and halfway along the frontage. In the north-western corner of the site, a continuous step-free access will be provided from Botany Road and along Grit Lane towards the Metro entrance.

The design of the public domain along the western part of the site will facilitate easy access between Building 2 and Botany Road (including the future bus interchange).

Church Square

The area between the Church and Building 2 will form a shared pedestrian and vehicular route. Vehicular access will only be permitted within the eastern part of Church Square. Generous tree planting and other landscaping along the site's boundary are provided, which will soften the appearance of the built form and further distinguish the development site from the church building.

The increased setback to the south-eastern corner of the building provides additional areas within Church Square.

Retail units at ground floor of Building 2 will front onto Church Square, activating the space and encouraging its use as a public thoroughfare.

Grit Lane and Grit Square

Grit Lane will be located to the north of Building 2 and comprise an activated laneway that will provide a continuous path of access from Botany Road to the Waterloo metro station entrance. The design and delivery of Grit Lane has been approved under the CSSI consent.

The entire northern frontage of Building 2 will comprise retail uses at ground floor, which will be accessed from and include outdoor seating along Grit Lane.

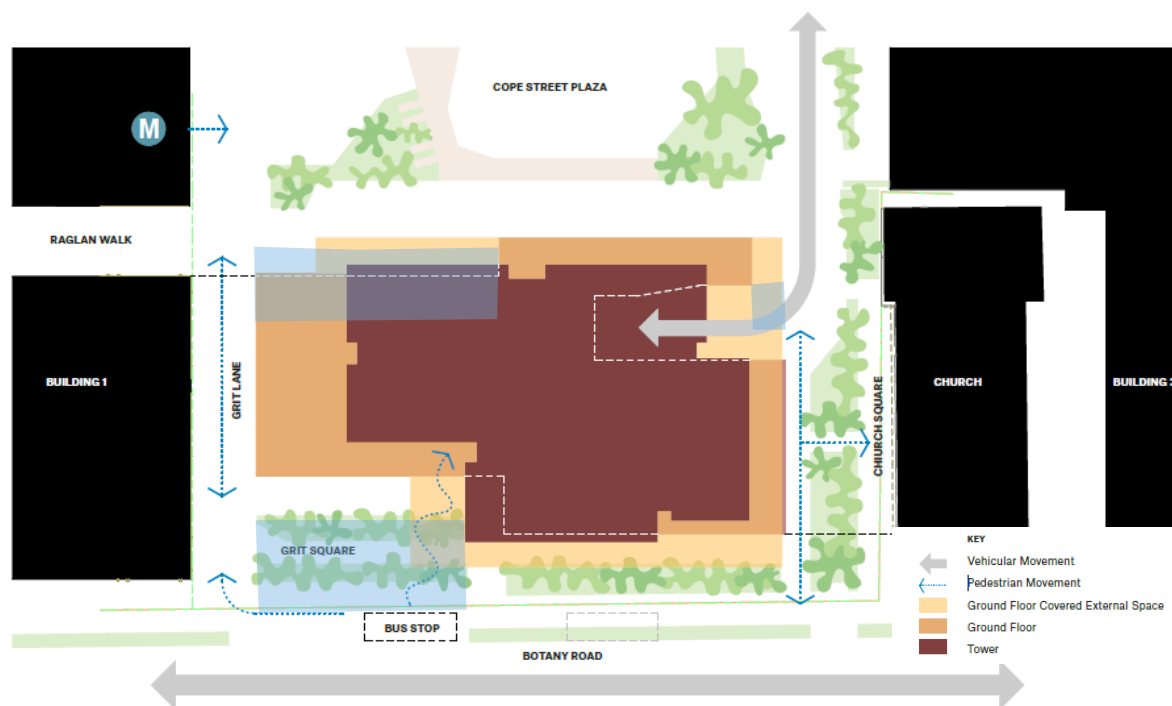
The proposal will also create a new public plaza – Grit Square, this is achieved via increased setback from Botany Road. Grit Square will be located at the northwestern corner of the building and is integrated with Grit Lane. Generous tree planting within Grit Square will enhance the amenity of this space for future residents and visitors. Outdoor seating will also be provided within Grit Square to activate the area. More importantly the location of Grit Square is next to the bus stop along Botany Road, which means this new plaza can provide a meeting point for visitors and residents and adopt the role of a public transport interchange plaza.

Overall, the proposed layout maximises active frontages within the site in accordance with the design criteria set out in Part 3I of the Waterloo Design and Amenity Guideline and will help create a vibrant precinct that positively contributes to the desired future character of the area.

Generous landscaping and tree planting will be provided within the public domain, enhancing the amenity of these spaces. Landscape elements, including planting seating and paving will enhance comfort, define these spaces and support social interactions.

The site layout promotes permeability across the wider WMQ and will create a high quality and integrated public domain that provide welcoming, inviting and attractive spaces within the site.

Figure 26 Public Domain and the Creation of new publicly accessible areas (new public domain areas are shaded in blue)



Source: Bates Smart (2025)

6.2.4. Façade strategy

The proposed materials and façade strategy will provide a high quality and contemporary appearance that positively contributes to the emerging character of the WMQ. The finishes and materials will contribute to establishing the central precinct's own distinct identity whilst complementing the appearance of the tower buildings within the northern precinct, which will utilise a similar material and colour palette. The materials and finishes respond to the site's surrounding context, which features significant brickwork and masonry elements, and draws inspiration from Country.

The blue tiled finish, glazed shopfronts and retractable awnings at ground floor level will create a unique and distinctive appearance that distinguishes the retail uses from the rest of podium and activates the surrounding public domain.

The podium materials and finishes will enhance visual interest within the site and ensure that it reads as a separate and distinct element to the tower above, which is in accordance with Part 3J of the Waterloo Design and Amenity Guideline. Articulation on Levels 1 and 2 of will predominately be focused on the eastern and western facades, which will be prominent from surrounding public domain including Cope Street Plaza and Botany Road. A patchwork of masonry block in pottery colour and masonry breeze screens are proposed across these elevations, providing a mix of textures that will create visual interest and provide natural ventilation and solar access to the childcare facility. Brick blockwork will also be utilised on the southern and northern elevations with subtle colour variations providing horizontal banding. Integrated planting within the Level 1 and 2 facades will soften the appearance of the proposed built form.

The patterned blockwork and other materials will articulate the podium whilst providing an appropriate transition to terracotta-coloured cladding on the tower above.

The proposed tower façade strategy seeks to respond to the different environmental conditions across the site whilst creating a cohesive architectural expression that is carefully woven and integrated with the podium below. A range of façade typologies are proposed with glazing concentrated on the eastern, western and southern elevations that overlook the public domain (Cope Street Plaza and Botany Road) and have views towards Alexandria Park (southern elevation). A more considered approach is proposed along the northern elevation given its interface with the development in the northern precinct.

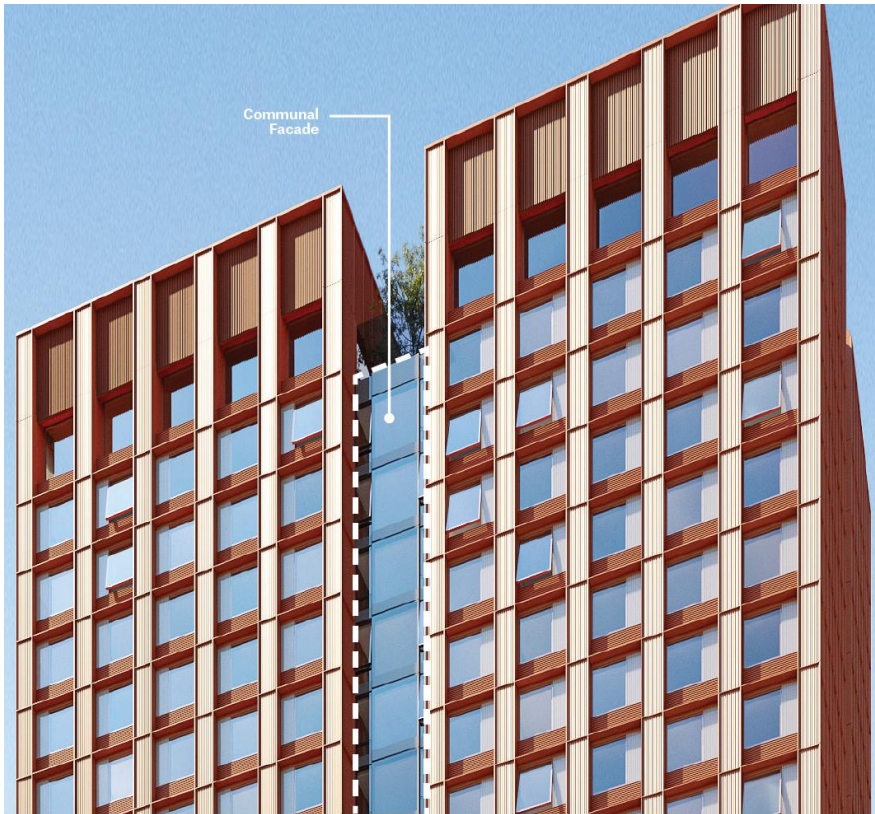
The tower facade reflects a fine grain approach, which has been endorsed by the SDRP. Additional windows and a double height void at Level 4 create dual aspect corner units and enhance solar expression towards Cope Street Plaza.

On the more prominent eastern elevation facing Cope Street Plaza, full height glazing to the communal rooms is proposed on the entire tower elevation (refer to the figures below). The full-height glazing will provide further articulation and visual interest when viewed from Cope Street Plaza. The glazing is also slightly recessed to break up the tower massing and reduce the perceived bulk. This design approach was recommended by the SDRP and has been adopted in the proposed scheme.

Blank end walls have also been minimised in accordance with the Waterloo Design and Amenity Guideline.

The proposed façade strategy creates a varied and interesting built form that positively contributes to the emerging character of the Waterloo Metro Quarter precinct.

Figure 27 Full height glazing to communal rooms



Source: Bates Smart (2025)

Figure 28 View of proposed Building 2 from east of the site



Source: Bates Smart (2025)

6.2.5. Crime prevention through environmental design

A crime prevention through environmental design (CPTED) report has been prepared by Connley Walker and is enclosed in **Appendix P**. The report includes an assessment of the proposed development against the key CPTED principles. The assessment of development applications as follows:

- **Surveillance:** Active spaces within the building have been located to maximise casual surveillance. This includes the active retail frontages along the ground floor level, which will provide natural surveillance to the surrounding public domain including Raglan Walk, Grit Lane and Church Square. As busy retail and pedestrian environments, Grit Lane and Church Square will offer good natural surveillance of surrounding streets and laneways.
- Natural surveillance of the entrances to the childcare facility and co-living accommodation will be provided from Botany Road. The communal areas of the co-living area will also provide natural surveillance to other areas of the site.
- **Access control:** An electronic access control and keying system will be installed throughout the building to ensure that residents and visitors can only access the areas of the building that they are authorised to do so. Once installed, an electronic access control system can be programmed to allow individual tenants access to only certain parts of the building (E.g. only childcare centre operators will be able to access the childcare centre). Residents of the co-living accommodation will have access to the communal areas as well as their accommodation and any other areas determined by building management.
- **Territorial reinforcement:** Overt CCTV surveillance will be installed to discourage loitering in areas of the public domain such as along Raglan Walk and Church Square. CCTV surveillance is also recommended for the childcare facility.
- **Maintenance:** This requirement will be addressed as part of the day-to-day operational management of the site. This will include graffiti removal and repairs to building damage as required.

The design of the proposed development also addresses the requirements of City of Sydney DCP by minimising blind-corners, recesses and other external areas that have the potential for concealment and ensuring entries are clearly visible, unobstructed and easily identifiable.

To minimise the risk of crime, additional mitigation measures are proposed including:

- Installation of CCTV within the site including in all public spaces; at building entries and lobbies; lift lobbies; within lifts; at concierge points; roof access points; and plant room entries
- Installation of electronic access control located at lifts; entries to building management area; and non-public entries.

6.3. Co-living and Child Care Amenity

6.3.1. Co-living accommodation

The layout of the co-living accommodation has been designed to maximise amenity for future residents by minimising the number of rooms directly facing Botany Road (only six per typical floor) and locating communal terraces at the top of the podium and tower to maximise natural daylight and views.

Section 1.9 of the Sydney LEP 2012 states that Chapter 3 Part 3 of State Environmental Planning Policy (Housing) 2021 does not apply to land in the Waterloo Metro Quarter. Chapter 3 Part 3 of the Housing SEPP relates to co-living housing and includes non-discretionary development standards (Section 68) and 'standards for co-living housing'.

Whilst not strictly applicable to the proposed development, an assessment against the non-discretionary standards and standards for co-living housing has been included in **Appendix II** for completeness. The assessment shows that the proposed development is generally consistent with the non-discretionary standards and standards for co-living housing. Where variations are proposed, these do not impact the quality or amenity of the co-living housing and are consistent with the scheme endorsed by the SDRP.

6.3.2. Childcare

A preliminary assessment of the proposed development against the provisions of the 'Child care planning guideline (2021)' ('the guideline') is enclosed in **Appendix NN**. The assessment demonstrates that the proposed childcare facility is capable of complying with the provisions set out within the guideline. However, a detailed compliance assessment against the guideline will be undertaken as part of a future fit-out DA for the childcare facility.

The assessment contained within **Appendix NN** confirms that the proposed childcare facility will comply with the minimum indoor play area requirements set out within Regulation 107 of the Education and Care Services National Regulations.

Given that the proposal relies on the use of simulated outdoor play space, the future fitout DA will need to seek a waiver from strict compliance with Section 108 of the Regulation.

Under Clause 22(1)(b) of the Educational Establishment and Child Care Facilities SEPP 2017, concurrence with Regulatory Authority is required for a proposal that does not strictly meet the outdoor unencumbered space requirements of Section 108 of the Regulation.

The Childcare Planning Guideline published by Department of Planning, Industries and Environment outlines the requirements for simulated outdoor environments and identifies that simulated outdoor play space is a preferred alternate solution where unencumbered outdoor space requirements cannot be met.

The podium facade design, including the locations of the open masonry screens as well as the position of openings, will maximise solar penetration and provide natural ventilation to the simulated outdoor play spaces.

The openings have been balanced with patterned masonry screens to ensure safety and fabric shading to increase sun protection particularly through the summer months. A solar access assessment has been undertaken by Bates Smart, which confirms that the simulated outdoor play space is able to receive at least 3 hours of sunlight between the hours of 9am and 3pm on June 21.

Planters and landscaping proposed around Level 1 and Level 2 of the podium will also enhance the amenity of the childcare facility and create a welcoming and friendly environment.

6.4. Environmental Amenity

6.4.1. Solar Access

A Solar Access Report has been prepared by RWDI (refer to **Appendix L**) to assess the ability of the communal living areas and communal open spaces within the co-living accommodation to access direct sunlight. The assessment was undertaken using 3D computational modelling of the proposed development and its surrounding context, combined with meteorological data for Sydney.

Whilst not directly applicable to the WMQ, Section 69 of the Housing SEPP provides a benchmark for considering solar access within the co-living accommodation. It states that:

"at least 3 hours of direct solar access will be provided between 9am and 3pm at mid-winter in at least 1 communal living area".

The Sydney Development Control Plan (DCP) 2012 does not apply to State significant development. Notwithstanding, it also contains development controls relating to solar access in student accommodation that provides a benchmark for the proposed co-living accommodation. These controls include:

indoor communal living areas are to be located to receive a minimum of 2 hours of solar access to at least 50% of the windows during 9:00 am and 3:00 pm on 21 June.

communal outdoor open space is to be located and designed to generally be north-facing to receive at least 2 hours of solar access to at least 50% of the area during 9:00 am and 3:00 pm on 21 June.

The solar analysis demonstrated that two communal living areas within Building 2 will receive more than 3 hours of sunlight access to their windows between 9am and 3pm on 21st June consistent with the

requirements of Section 69 of the Housing SEPP. Additionally, all communal living areas within Building 2 will have access to at least 2.5 hours or more of solar between 9am and 3pm on 21st June, satisfying the Sydney DCP 2012.

Generous communal outdoor space is provided at Level 3 and 24 for the co-living accommodation. More than 50% of the communal outdoor space at Level 24 will achieve at least 3 hours solar access between 09:00 and 15:00 on mid-winter, consistent with the requirements of control 2c of Section 4.4.1.4 of the DCP.

The Level 3 communal outdoor space will not achieve the criteria set out within the Sydney DCP, the terrace will allow for continuous access (for a period of six hours) to sunlight throughout the day as follows:

- The eastern aspect of the terrace will receive direct sunlight between 9am and 12:45pm
- The western aspect benefiting from direct solar access between 1pm and 3pm at mid-winter.

Accordingly, the Level 3 terrace will provide a high level of amenity for future residents in accordance with the objectives of the DCP.

A cumulative impact assessment also been undertaken to understand the impacts of nearby and future developments on solar access within Building 2. It is anticipated that the future Waterloo Estate Development is unlikely to significantly increase shadowing to the proposed development and that the cumulative impact of future development is unlikely to materially reduce solar access to the central precinct.

Overall, the communal internal living areas and communal outdoor open spaces within the co-living tower will achieve a good level of solar access, enhancing the overall amenity of the site for future residents.

6.4.2. Overshadowing

An Overshadowing Report has been prepared by RWDI in respect of the proposed development and the concurrent detailed SSDA for the WMQ northern precinct and is enclosed in **Appendix J**. The shadow analysis considers cumulative impacts from both the northern precinct and central precinct development to Alexandria Park located to the west of the site as well as to Cope Street Plaza and surrounding residential properties.

As part of the SDRP review process, the roof top plant on Building 2 was revised to reduce overshadowing impacts to Alexandria Park.

Alexandria Park

Section 3M of the Waterloo Design and Amenity Guideline requires:

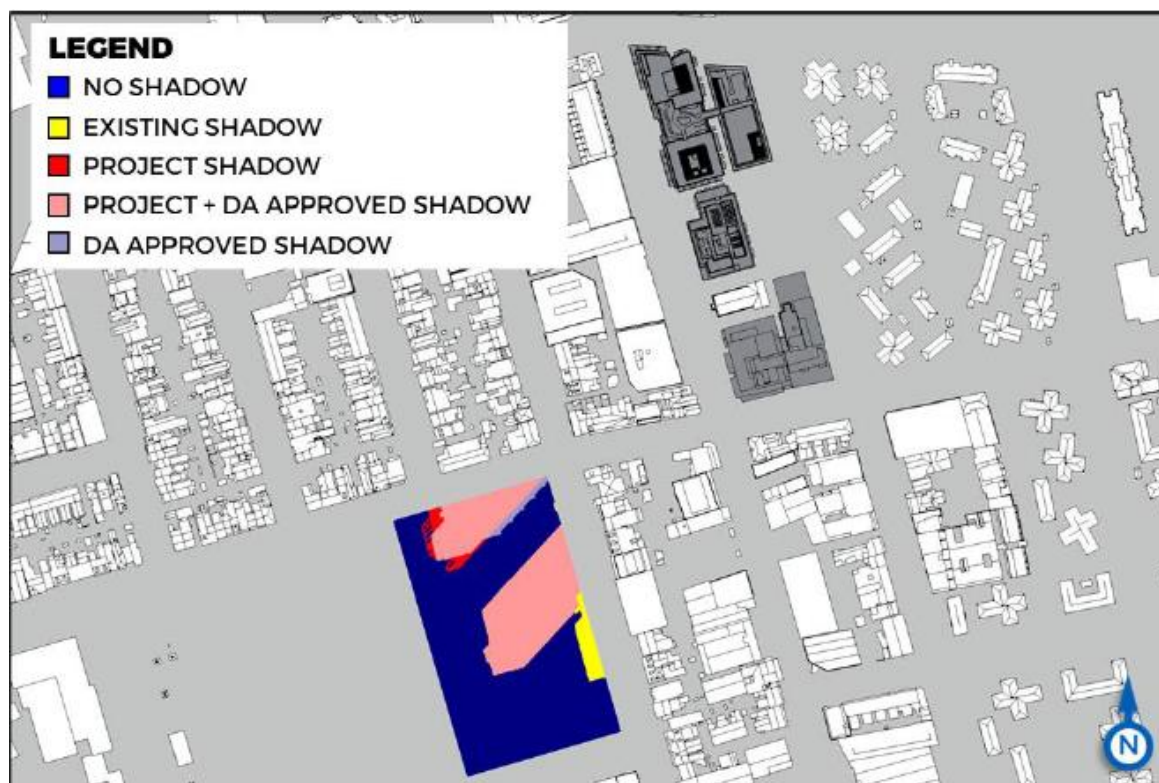
- Design Criteria 1: the development does not result in any additional overshadowing of Alexandria Park after 10am on 21 June
- Design Criteria 2: No more than 30% of Alexandria Park, excluding the oval, is overshadowed by the development as measured at any time after 9am on 21 June

The RWDI modelling shows that at 9am on 21 June the proposed central precinct development and northern precinct development (SSD-7907758) will result in overshadowing to 29.9% (i.e. 4,362.2 square metres) of Alexandria Park. This is just under the Waterloo Design and Amenity Guideline design criteria and represents a slight improvement compared to the previously approved developments for the central and northern precincts, which resulted in overshadowing to 29.94% (i.e. 4,368.8 square metres) of Alexandria Park (excluding the oval) at 9am at mid-winter.

Accordingly, the development now proposed will result in a slight reduction in overshadowing (by 6.6sqm) compared to the previously approved development and the impacts to Alexandria Park at 9am are acceptable.

The overshadowing modelling undertaken by RWDI also shows that the impact from the proposed central precinct development and northern precinct development will not result in any additional overshadowing to Alexandria Park after 10am at mid-winter. Compliance with design criteria 2 of Section 3M of the Waterloo Design and Amenity Guideline is therefore also achieved.

Figure 29 Shadow impacts to Alexandria Park - 09:00 at mid-winter



Source: RWDI (2025).

Figure 30 Shadow impacts to Alexandria Park - 10:00 at mid-winter



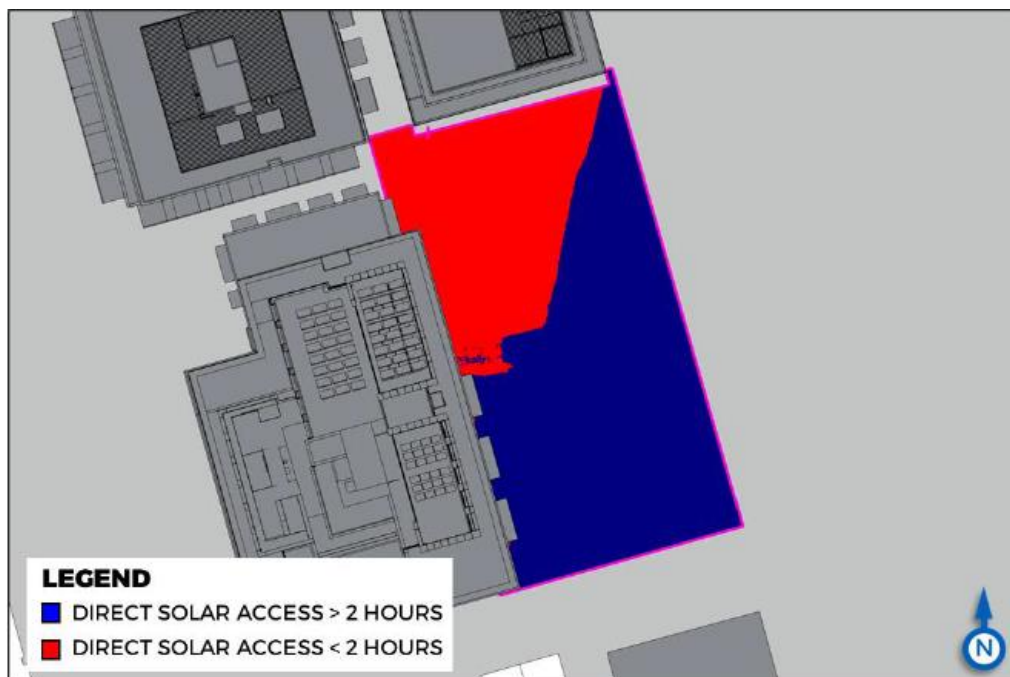
Source: RWDI (2025)

Cope Street Plaza

Design Criteria 4 of Section 3C of the Waterloo Design and Amenity Guideline requires at least 50% of Cope Street Plaza to receive two hours of sunlight between 9am and 3pm at mid-winter. RWDI's solar simulations (conducted at 1-minute intervals) confirm that 61.1% of Cope Street Plaza will receive at least 2 hours solar

access at mid-winter following the completion of the proposed central precinct and northern precinct developments, which significantly exceeds the design criteria and improves on the previous approvals for the central and northern precincts (these resulted in 57.3% of the plaza receiving at least 2 hours solar access at mid-winter).

Figure 31 Shadow impact to Cope Street Plaza at mid-winter



Source: RWDI (2025)

Neighbouring development

Design Criteria 3 of Part 3M of the Waterloo Design and Amenity Guideline requires that:

“Proposed apartments in a development and neighbouring developments must achieve a minimum of 2 hours direct sunlight between 9am and 3pm on 21 June onto at least 1m² of living room windows and a minimum 50% of the required minimum area of private open space area

Note: This applies to at least 70% of the apartments in a development in accordance with the NSW Apartment Design Guide”.

Additionally, Design Criteria 4 states that:

“New development does not create any additional overshadowing onto a neighbouring dwelling where that dwelling currently receives less than 2 hours direct sunlight to habitable rooms and 50% of the private open space between 9am and 3pm on 21 June”.

The RWDI analysis demonstrates that the proposed central precinct development and northern precinct development is not expected to reduce the solar access of neighbouring residential properties, including those located within the Waterloo Heritage Precinct, to less than 2 hours between 09:00 and 15:00 on 21st June for the areas that received more than two hours solar access under existing conditions.

The private outdoor spaces of the residential properties located at 11, 13, 15 and 19 Buckland Street (located to the south west of the site) currently receive solar access for less than 2 hours on 50% of the area between 09:00 and 15:00 on 21st June. As these properties are south-facing their living area windows are likely to be located on the southern elevation and not exposed to sunlight.

The RWDI analysis shows that the proposed development will create an additional 6.4 square metres of overshadowing to the private open spaces of the properties located at 11, 13, 15 and 19 Buckland Street compared to the previously approved scheme. This increase is minimal and is not anticipated to result in a material reduction in solar access or the amenity of these properties.

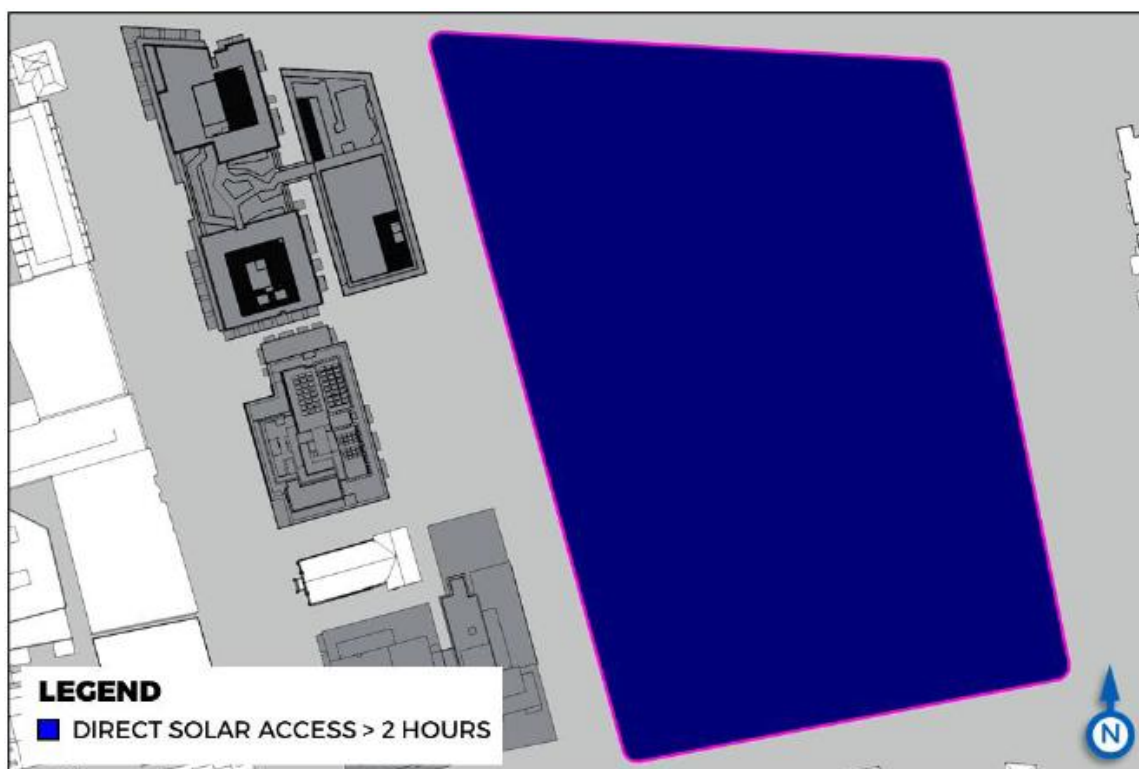
Overshadowing to the properties to the south of Buckland Street is predominately a result of the approved Buildings 3 and 4 in the southern precinct. The proposed central precinct and northern precinct development will not result in additional impacts to these properties compared to the previously approved development.

Overall, a very small number of dwellings will experience additional overshadowing within their private open spaces. However, the additional overshadowing is minimal and will not materially reduce the amenity these properties enjoy.

Future Waterloo Park

Shadow impact analysis has also been undertaken to understand the impacts of the overall proposed development on the future Waterloo Park that is expected to be delivered to the east of the WMQ site. The analysis demonstrates that the entire future Waterloo Park will receive at least two hours of sunlight between 09:00 – 15:00 at mid-winter.

Figure 32 Shadow analysis - Future Waterloo Park



Source: RWDI (2025)

In conclusion, the proposed development (including northern precinct) is able to comply with the criteria of the Waterloo Design and Amenity Guideline and will not impact on the solar amenity of the future Park.

6.4.3. View loss and view sharing

View analysis has been undertaken by Urbis within the Visual Impact Assessment enclosed in **Appendix N**.

The view analysis considers the cumulative impact of the central and northern precinct to the private domain of surrounding residential flat buildings. It is concluded that:

- Private domain visibility is predominantly restricted to elevated viewing locations in surrounding residential flat buildings.
- The proposed towers from these locations are unlikely to occupy any significant extent of the wider view (or views) available.
- The towers, from these locations, are unlikely to block access to compositions of high scenic quality, unique features or icons (for example Central Station Clock tower, the Eveleigh Precinct and Carriageworks etc).

Accordingly, it is unlikely that the proposal will impact on views from surrounding residential flat buildings.

6.4.4. Wind Impacts

A Pedestrian Wind Environment Assessment (**PWEA**) Report has been prepared by RWDI and is included at **Appendix I**. The PWEA comprises a desktop study and wind tunnel assessment to evaluate existing conditions, the proposal development (central precinct and northern precinct) and scenarios incorporating mitigation (including screening and landscaping).

The Waterloo Design and Amenity Guideline specify the following wind criteria for the public domain:

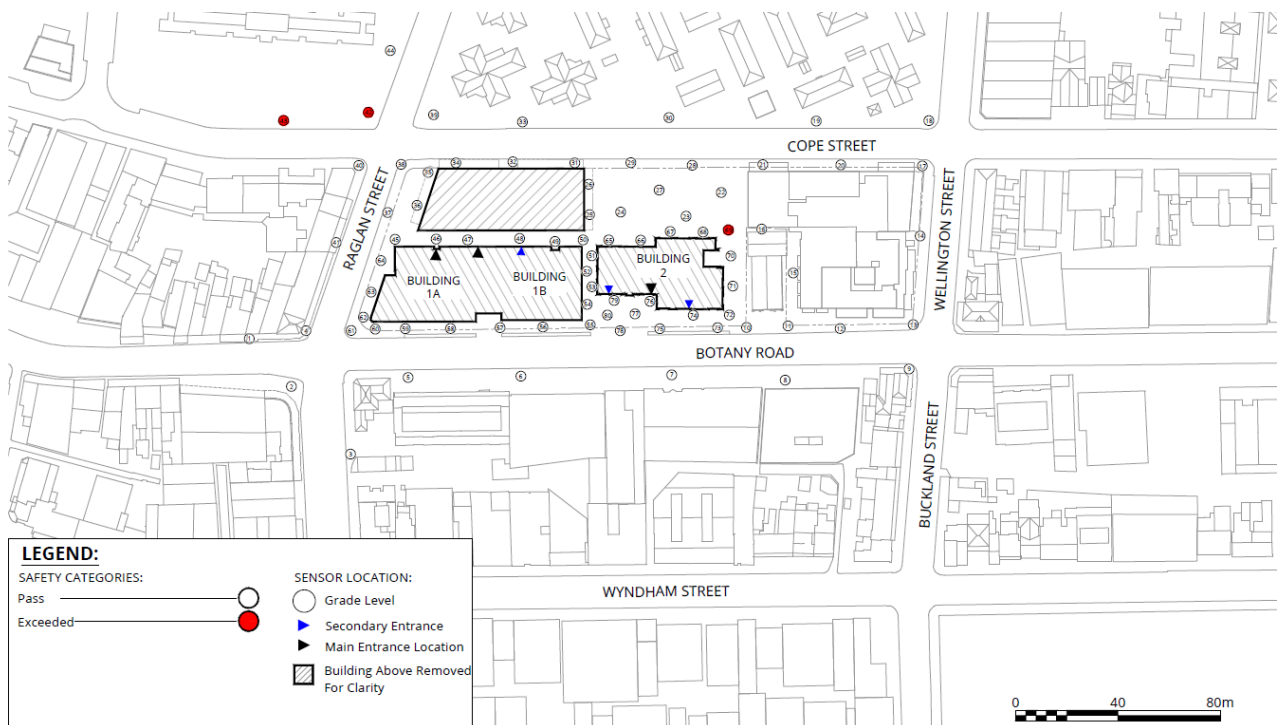
- At least 50% of publicly accessible open space meets the wind comfort standard for sitting. Outdoor dining and casual areas should correspond with these areas.
- Waiting areas at bus stops and pedestrian crossings is to meet the wind comfort standard for standing.
- Development must not exceed the wind safety standard of 24m/s (gust - 0.1% exceedance).

6.4.4.1. Pedestrian safety

In the existing condition, wind safety limits are exceeded at two locations on Cope Street, primarily due to the interaction of westerly winds with the Marton Building.

These exceedances persist with the proposed development, with an additional minor exceedance identified at the eastern end of Church Square. All other areas within and around the development, including elevated spaces, comply with the wind safety criteria.

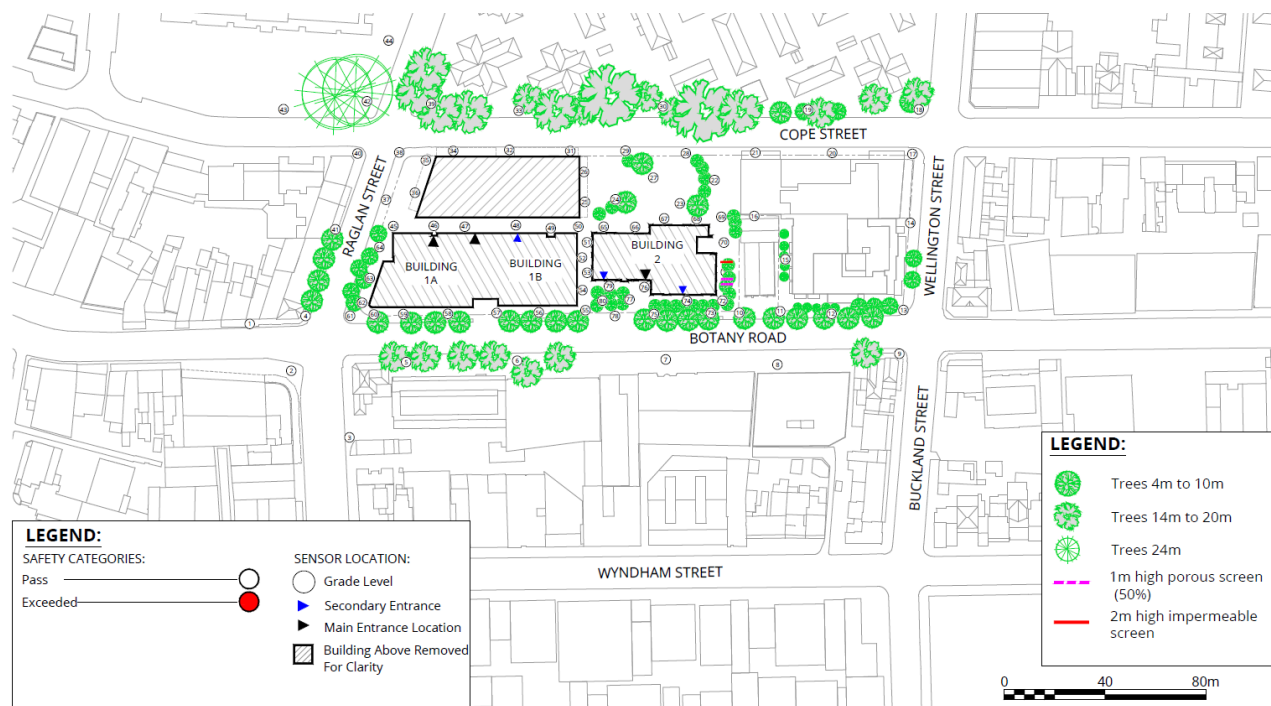
Figure 33 Pedestrian wind safety conditions



Source: RWDI (2025)

RWDI has modelled the proposed development with mitigation measures, including two 1m high porous screens and a 2m high impermeable screen in Church Square and site-wide landscaping. With these treatments in place, all exceedances, including the pre-existing Cope Street exceedance outside the site, are resolved.

Figure 34 Pedestrian wind safety conditions with the inclusion of mitigation measures and landscaping

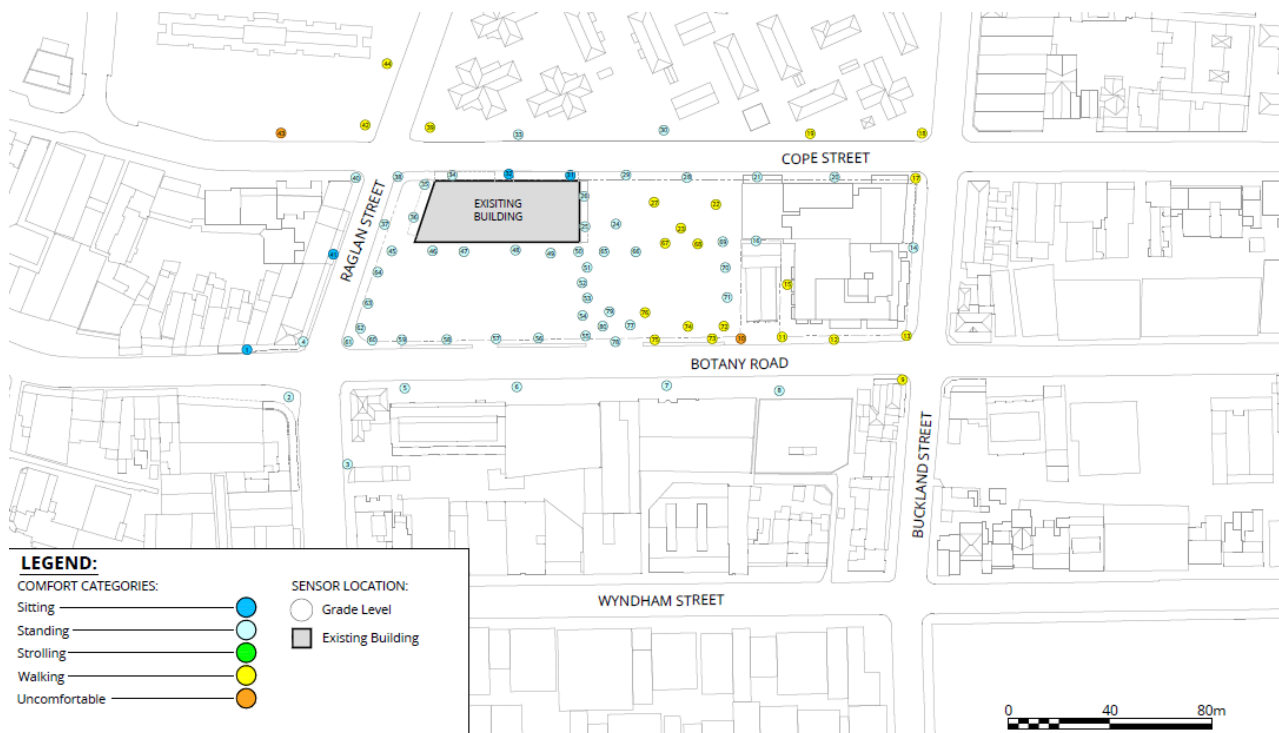


Source: RWDI (2025)

6.4.4.2. Pedestrian comfort

Under existing conditions, most of the surrounding streets and open spaces are suitable for standing to walking use, with some calmer areas to the east and north suitable for sitting. Two uncomfortable locations were identified, located along Cope Street (outside the development site) and near the Waterloo Congregational Church.

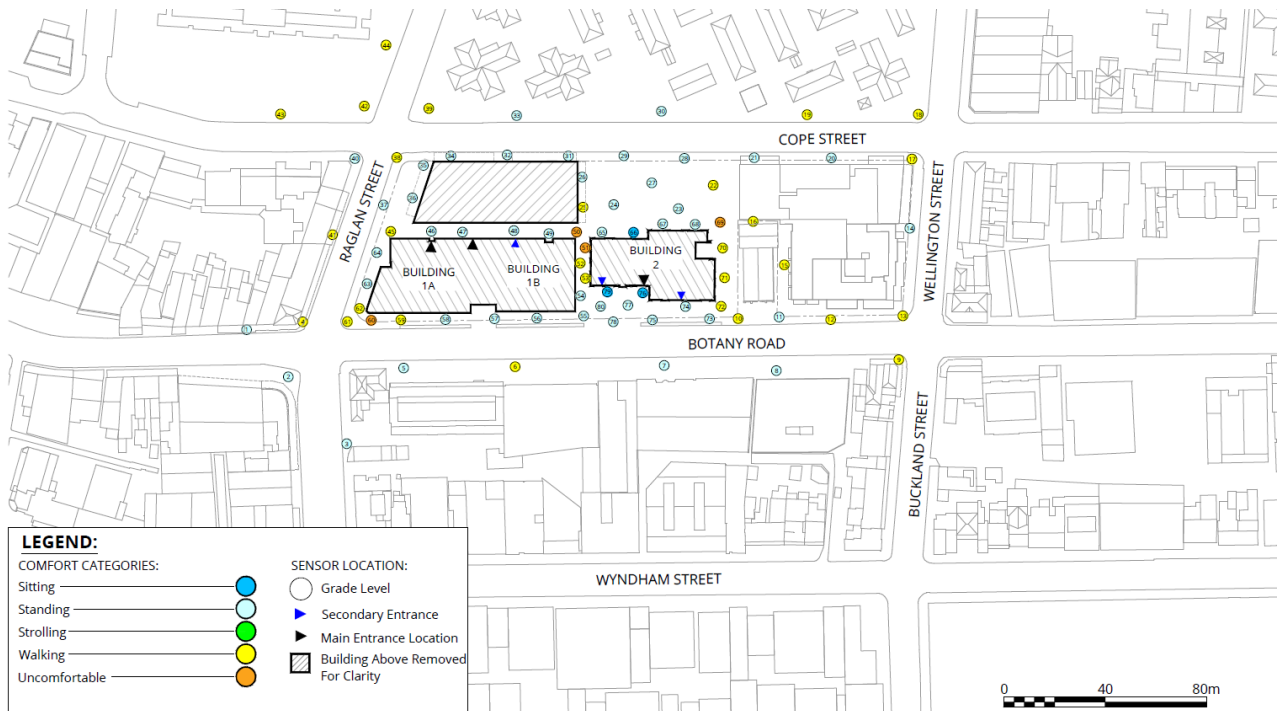
Figure 35 Pedestrian Wind Comfort existing conditions



Source: RWDI (2025)

With the proposed development, most ground-level locations remain within acceptable comfort levels, generally ranging from standing to walking use. Four uncomfortable locations are predicted being the corner of Raglan Street and Botany Road on the north-west corner of the northern precinct, two locations within Grit Lane and the south-east corner of the central precinct near Church Square.

Figure 36 Pedestrian Wind Comfort proposed scenario (ground plane)



Source: RWDI (2025)

The modelling demonstrates that the introduction of mitigation measures (including screening and landscaping) resolve all previous uncomfortable wind conditions at the ground level. Conditions at Grit Lane and the north-west corner of Building 1 improve to walking use, which is considered appropriate for circulation. Conditions in the south-east corner of the central precinct improve to standing criteria.

Figure 37 Proposed pedestrian wind comfort conditions (with mitigation and landscaping)

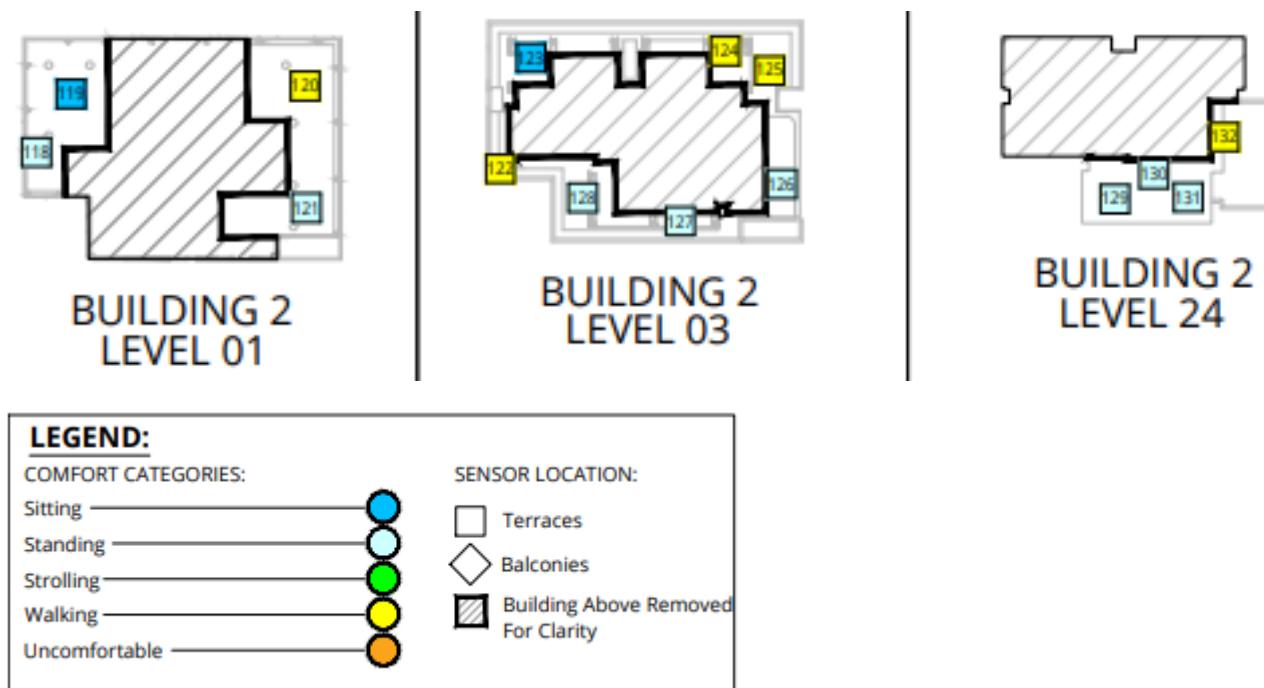


Source: RWDI (2025)

The RWDI analysis shows that above ground level in Building 2:

- the outdoor (simulated) play spaces located on levels 1 and 2 of the podium are generally expected to achieve standing criteria. Walking conditions are achieved in the south-eastern corner of the outdoor play space. This is considered suitable for active play areas.
- The Level 3 co-living communal terrace predominately achieves sitting and standing criteria. The analysis demonstrates that walking conditions are achieved in the north-west and south-east corners.
- The rooftop terrace on Level 24 will experience wind conditions suitable for standing use within the terrace and walking conditions within the walkway along the southern wall.

Figure 38 Above ground wind comfort conditions



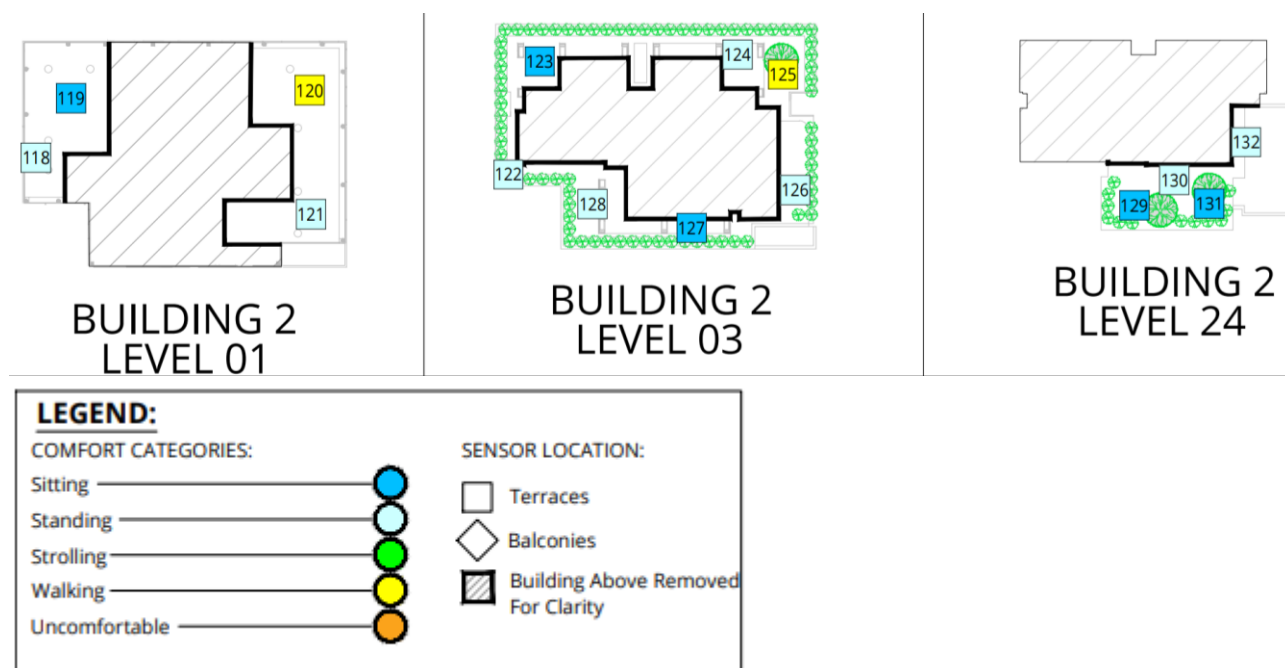
Source: RWDI (2025)

The proposed landscaping located on Levels 1 and 2 of the Building 2 podium have not been included within the wind modelling. This landscaping has the potential to improve wind conditions (to standing conditions) in the south-east corner of the podium.

The proposed planting located on Level 3 communal terrace will also improve wind conditions within this area of the site. Accordingly, the majority of the terrace is expected to achieve sitting and standing criteria. The seating areas at the south-eastern corner of the site will still achieve walking criteria.

The landscaping on the roof terrace will improve wind conditions to sitting or standing criteria at all locations.

Figure 39 Proposed above ground wind comfort conditions (with landscaping)



Source: RWDI (2025)

The assessment also considered nearby future developments, including the Waterloo Estate and Redfern North Eveleigh. These are not expected to create significant additional wind impacts for the precinct. The proposed development will provide shielding benefits for some areas, and landscaping within Waterloo South's new park will help moderate localised conditions.

Mitigation Measures

Based on the outcomes of the wind tunnel testing, the PWEA recommends additional wind mitigation strategies be incorporated into the design to further enhance pedestrian comfort. Of relevance to the central precinct, the PWEA recommends:

- The inclusion of porous balustrades along the raised seating area located in the north and north-western part of the site
- The inclusion of tree planting atop the northern Level 2 green roof
- The inclusion of impermeable balustrading around the proposed sitting areas located in the western part and south-eastern corner of the Level 3 terrace.

With the incorporation of the mitigation measures and proposed landscaping, the PWEA confirms that the development will achieve safe and comfortable wind conditions which are consistent with the Waterloo Design and Amenity Guideline and will deliver a high level of amenity for future public domain users and tenants.

6.5. Visual impact

A Visual Impact Assessment (VIA) has been prepared by Urbis (**Appendix N**) to assess the visual impacts of the proposed development.

6.5.1. Existing environment

The site's immediate visual context is predominantly characterised by low-height or low-rise medium density built form in all directions. This comprises commercial premises to the north, light industrial and mixed-use development to the south-west, and residential development to the east.

The wider visual context includes built form of greater height including student housing towers in Redfern, Matavai, other social housing towers in Waterloo, and Redfern Public Housing to the north and north-east.

The immediate and wider visual context is proposed to transition a higher density environment as proposed in the Waterloo Estate development.

Several heritage conservation areas are also located in the vicinity of the site.

Based on the existing visual environment, the proposed development is expected to be visible from the following significant public (and State heritage listed) locations:

- Parts of Eveleigh Railway Workshops, north-west of the site.
- Parts of Central Station, north of the site.
- Parts of Redfern Park, north-east of the site.
- Parts of Moore Park north-east of the site.
- Sydney Park.

Further public domain views will be possible from roads bounding the site including Botany Road, Raglan Street, Cope Street and Wellington Street as well as sections of roads in the medium distance that align with the site such as Henderson Road and Raglan Street East.

Scenic Quality

The heritage items located in the vicinity of the site contribute to the scenic quality of the site.

Public view sensitivity

The VIA considers the public view sensitivity of the site as follows:

- Views from Botany Road would typically be from moving situations for short durations of time. The section of Botany Road where close views would be possible from is constrained to a short section immediately west of the site due to the presence of surrounding development and vegetation to the north and south of the site.
- Close views are possible from immediately surrounding streets including Raglan, Cope and Wellington Streets. The daily number of viewers from these locations would be less than from Botany Road.
- Mid and upper sections of any proposed tower forms would likely be visible along view lines from surrounding streets and roads due to their often open nature. Similar to close distance locations, these views would typically be from moving situation and for brief periods of time, but would be experienced by a high number of daily users.
- Long distance views of the proposed development would be influenced by the relative viewing height of the location providing opportunities for the viewer to have views over intervening elements. These locations would include places such as Sydney Park, which has panoramic views of the skyline to the north that would include the site.

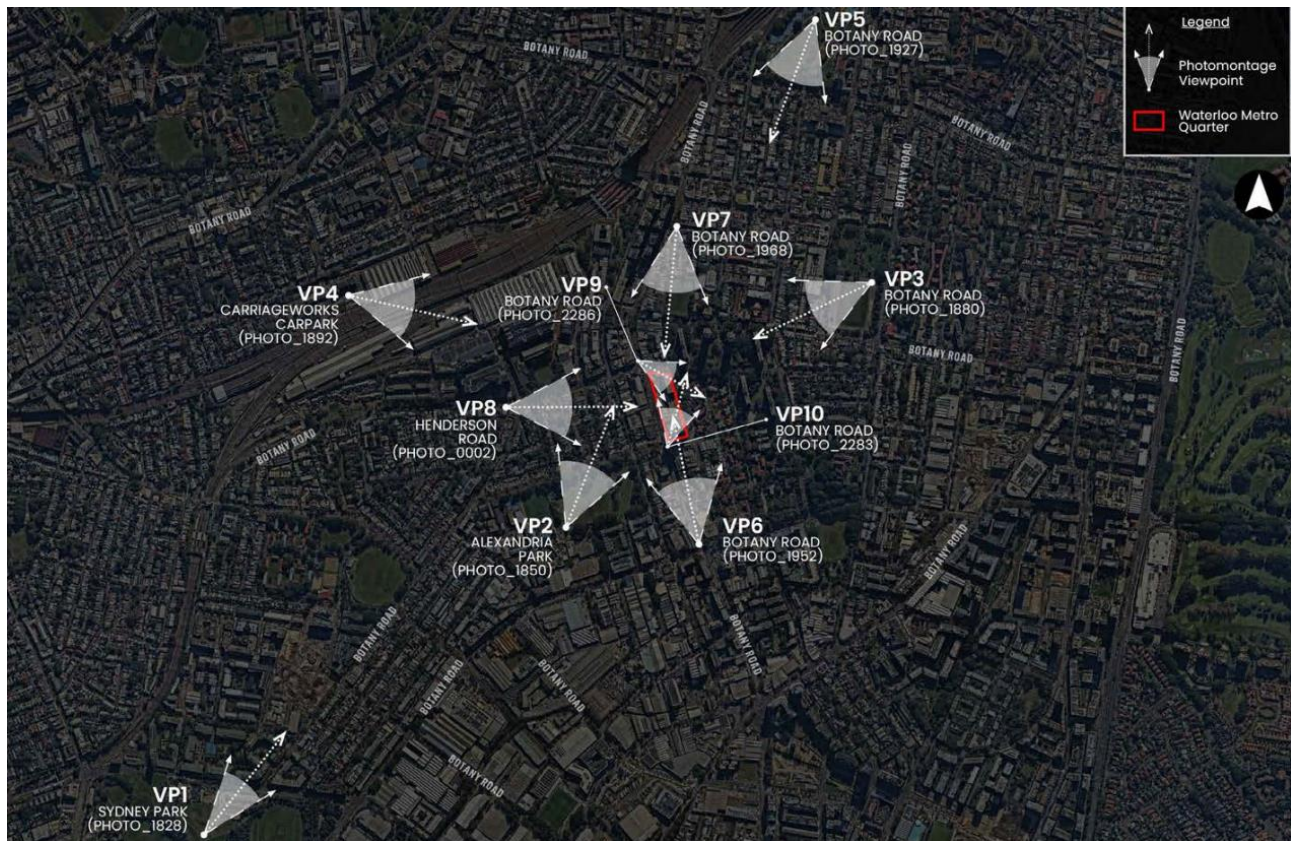
6.5.2. Potential Impacts

An assessment of the potential visual impacts of the proposed development at the following ten selected viewpoints was undertaken:

- Documented view from Sydney Park
- View north-east from Alexandria Park
- View west from Redfern Park
- View south from Carriageworks
- View south-west from Prince Alfred Park
- View north from the intersection of Retreat Street and Botany Road
- View south from Cope Street and Turner Street
- View east from the intersection of Henderson Road and Botany Road

- View south east from the intersection of Henderson Road and Botany Road
- View north east from the intersection of Buckland Street and Botany Road

Figure 40 Viewpoints Assessed in Visual Impact Assessment



Source: Urbis (2025)

Visual effects

The table below shows the existing view (including second amending concept DA envelopes) and the anticipated visual effects (extent of visual change) resulting from the proposed detailed development at assessed viewpoints. The extent of change resulting from the building envelopes (compared to the envelopes associated with the approved concept SSDA) is assessed in the VIA accompanying the second amending concept SSDA.

Photomontages were prepared to inform this analysis in accordance with the Land and Environment Court of New South Wales practice direction.

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 01	Documented view from Sydney Park			Low
View 02	View north-east from Alexandria Park			Low

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 03	View west from Redfern Park			Nil
View 04	View south from Carriageworks			Nil

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 05	View south-west from Prince Alfred Park			Nil
View 06	View north from the intersection of Retreat Street and Botany Road			Nil

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 07	View south from Cope Street and Turner Street			Low
View 08	View east from the intersection of Henderson Road and Botany Road			Low

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 09	View south east from the intersection of Henderson Road and Botany Road	 This image shows the existing view from the intersection of Henderson Road and Botany Road, looking south-east. Three buildings are highlighted with semi-transparent grey envelopes: Building 1A North (top left), Building 1B North (middle), and Building 2 Central (bottom right). The street scene includes traffic lights, cars, and pedestrians.	 This image shows the same view as the previous one, but with the proposed development overlaid. The buildings are now highlighted with semi-transparent blue envelopes. A legend in the top left corner indicates 'Second Amending Concept SSA Envelopes'. The street scene remains the same.	Low

View	Viewpoint Location	Existing View with second amending concept SSDA envelopes	View with proposed development	Visual effect
View 10	View north east from the intersection of Buckland Street and Botany Road	 This image shows the existing view from the intersection of Buckland Street and Botany Road looking north-east. It features several tall buildings, including Building 2 Central, Building 1B North, and Building 1A North. A yellow DHL van and a blue bus are visible in the foreground. A 'ONE WAY' sign and an 'END 40 AREA' sign are also present.	 This image shows the same view as the previous one, but with the proposed development overlaid in a light blue color. The proposed development is shown as a series of rectangular blocks that would be added to the existing building footprints. A legend in the top left corner identifies the 'Second Amending Concept 1A Envelopes'.	Low

Visual Impacts

Having determined the extent of the visual change based on the ten modelled views (photomontages), relevant weighting factors were applied to determine the overall level of visual impacts. The factors have been considered in relation to the visual effects to provide up-weight or down-weights and to determine a final impact rating. The factors include public domain view place sensitivity, visual absorption capacity, compatibility with urban features, viewing period and viewing distance.

Application of the weight factors resulted in an overall visual impact for each assessed view as follows:

- View 01 – Low
- View 02 – Low
- View 03 – Nil
- View 04 – Nil
- View 05 – Nil
- View 06 – Nil
- View 07 – Low
- View 08 - Low
- View 09 – Low
- View 10 – Low

Overall, the VIA concludes that the visual impacts of the proposed development are acceptable. The proposed development sits within the second amending concept envelope (i.e. is a reduction in massing compared to the proposed envelopes) and will have a substantially lesser impact on the local visual environment, due principally to the inclusion of detailing and articulation in the building form and façade.

The proposed development does not block any views to areas of unique scenic quality and has a high level of compatibility with the surrounding visual context, which is highly urbanised and includes several towers of a similar scale, form and height.

Built form and vegetation in the close and medium context help to screen the proposed development from views to varying degrees and limit the ability to perceive changes in existing visual compositions. From distant views the development is viewed in a wide visual composition amongst existing forms, which reduces visual impact.

The proposal is visually compatible with developments in similar locations in the wider Sydney region, which include higher density housing and tower forms located in proximity to transport hubs.

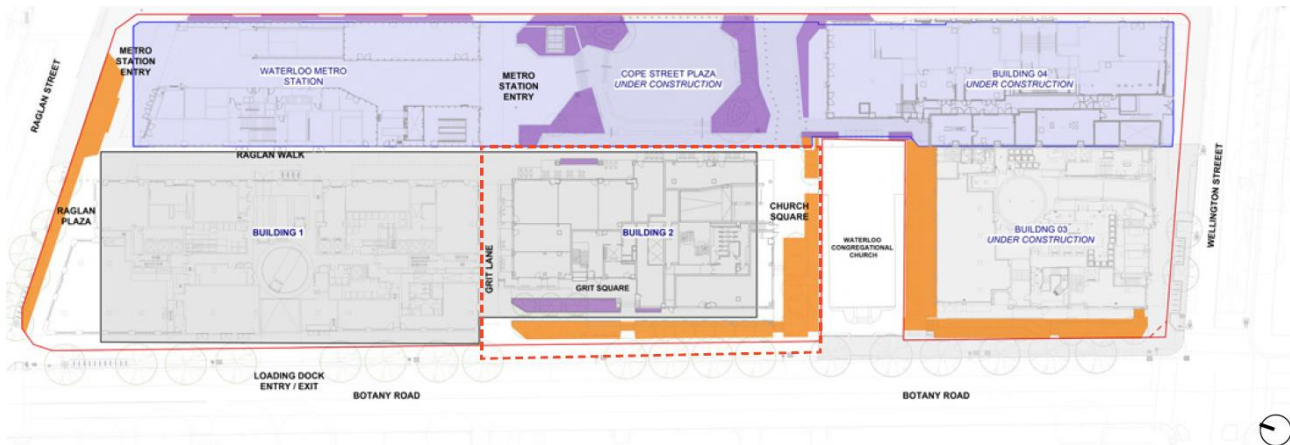
6.6. Landscaping

A holistic and co-ordinated landscaping design is proposed across the WMQ site.

The proposed landscaping and public domain will create high quality, integrated, permeable and multifunctional open spaces and responds to the relevant objectives, guidance and criteria of the Waterloo Design and Amenity Guideline. Comments received throughout the SDRP process have been also addressed in the landscaping scheme, including the selection of wind tolerant species at rooftop level.

Across the WMQ site, over 10% of the site area (excluding the station box) will comprise deep soil area, which exceeds the requirements of the Apartment Design Guide (7% for residential apartment development) and Sydney Development Control Plan (10% for mixed-use and commercial development).

Figure 41 Deep Soil Provision - WMQ



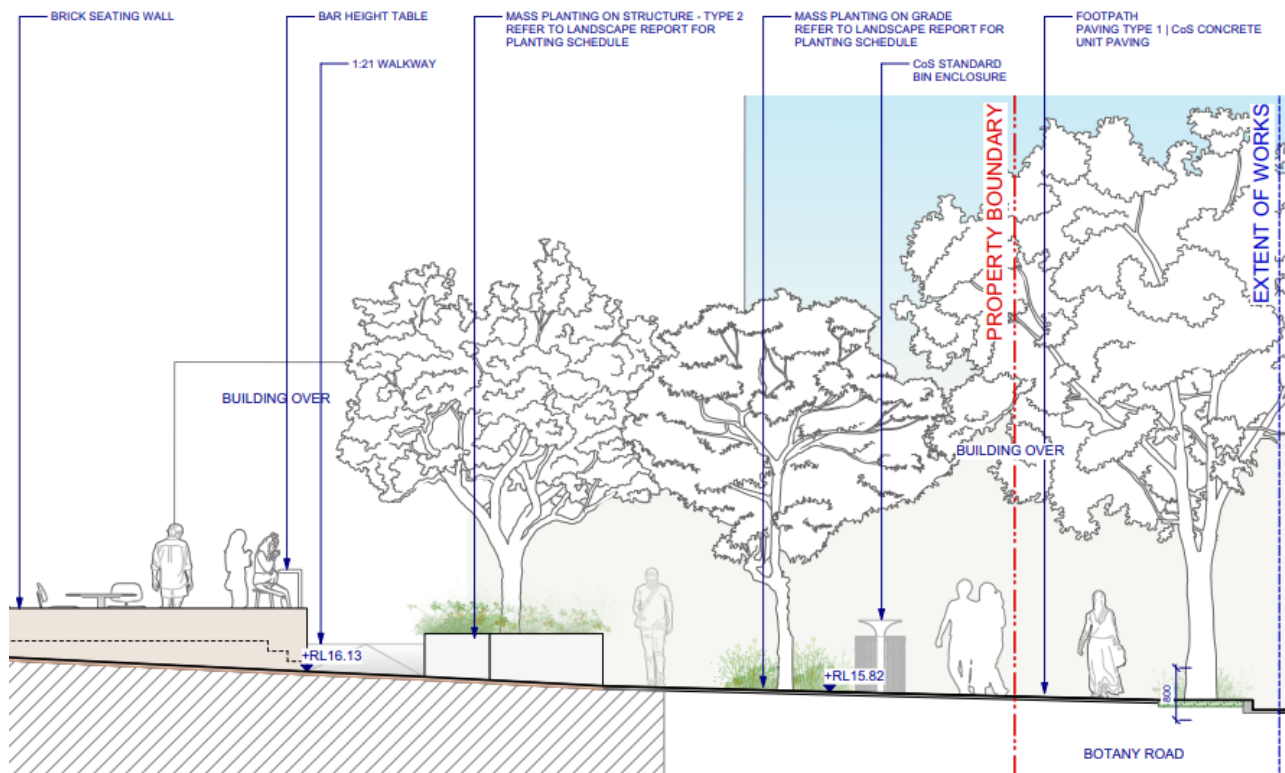
Source: Aspect (2025)

Within the central precinct deep soil is maximised along the western and southern boundaries of the site, facilitating significant planting within these areas. Deep soil will be supplemented by constructed soil areas in Grit Square and permeable paving adjacent to the Waterloo Congregational Church, which will support further planting and on-site stormwater drainage.

Landscaping within the central precinct will include significant tree planting located along the Botany Road frontage and the site's interface with the Congregational Church to the south.

The proposed planting will contribute to an overall canopy coverage of 27.35% across the wider WMQ, which exceeds the minimum requirement (23%) set out in Part 3E of the Waterloo Design and Amenity Guideline.

Figure 42 Proposed tree planting



Source: Aspect (2025)

Planting within the Precinct has been tailored to complement the character of each individual landscape area. A generous planted buffer is proposed within Church Square, incorporating trees ranging from 3 – 6

metres in height in the south east corner of the site and larger trees (6 – 8 metres) towards Botany Road. A double row of Tuckeroo trees (which reach a maximum mature height of up to 15m) will be planted between Grit Square and Botany Road, consistent with the requirements of the Waterloo Design and Amenity Guideline. Species within the western part of the site have been selected to ensure they are resilient to roadside conditions and will positively contribute to the amenity and future character of the Site by softening the built form.

Figure 43 Proposed tree planting



Lophostemon confertus
(Brush Box)



Cupaniopsis anacardioides
(Tuckeroo)



Harpulia pendula
(Tulipwood)



Lagerstroemia indica x fauriei 'Biloxi'
(Crepe Myrtle)



Lagerstroemia indica 'Red'
(Crepe Myrtle)

Source: Aspect (2025)

The proposed landscape approach will support vegetation growth; surface water drainage and contribute to mitigating the urban heat island effect by providing shading and cooling. The proposed planting will support microclimate regulation and establish a resilient and long-term leafy character across the site and the wider precinct. The public domain has been designed to minimise urban heat through material selection and maximising green infrastructure by prioritising planted zones. Additionally, the inclusion of permeable surfaces within the site will help offset heat build-up by allowing water infiltration and evaporation. Lighter-toned brick paving is also proposed to provide a more reflective surface that further reduces heat absorption.

The diversity of planting proposed within the site will provide visual interest and promote local ecology. Planting on the co-living communal terraces has been selected to prioritise low maintenance and resilience with a minimum of 70% low-water use native species proposed.

The proposed landscaping has also considered CPTED requirements by providing low planting in identified locations to ensure that clear sightlines are maintained. A combination of pole mounted luminaires and other mounted luminaires will be provided across the central precinct to ensure that the site is well-lit and enhance perceived and actual safety.

6.7. Traffic and Access

A Transport, Traffic and Parking Impact Assessment (enclosed in **Appendix R**) and Construction Traffic Management Plan (enclosed in **Appendix S**) have been prepared by PTC.

The Transport, Traffic and Parking Impact Assessment considers the impacts of the proposed development on the operation of the existing road network. The Construction Traffic Management Plan set out the measures that will be implemented during the construction phase to minimise traffic impacts associated with construction vehicles accessing the site.

6.7.1. Existing Environment

The site is primarily serviced by Botany Road, which is classified as a State Road. Several other State Road are also located within the broader area, ensuring that access to the site from the broader Sydney Metropolitan area is readily available.

The immediate road network around the site also includes Cope Street (local road), Raglan Street (Local Road) and Wellington Street.

Numerous bus stops are located within 400 metres of the site. Access to the site via public transport is also available via the Waterloo metro station (located within the WMQ) and Redfern Station. It is understood that Council also has aspirations for further upgrades to the public transport network in the vicinity of the site.

A high level of pedestrian amenity is generally experienced within the vicinity of the WMQ precinct. Footpaths and kerb ramps are present on both sides of surrounding streets. Signalised pedestrian crossings are provided at the intersections of Botany Road / Raglan Street and Botany Road / Wellington Street as well as along Botany Road, Regent Street and Gibbons Street (both to the north of the site).

The site has is easily accessed from the regional cycle network, which provides direct connections to a range of key destinations including the University of Sydney, Redfern Station, Sydney CBD, Newtown and Moore Park. However, east-west movement is constrained by the existing heavy rail corridor to the west of the site.

The City of Sydney Council has identified new cycle routes, which will further enhance connectivity within the LGA. These include several new routes running through Waterloo and close to the WMQ site.

The site is currently vacant and therefore does not generate any traffic activity. However, construction works are being undertaken within the wider site. Traffic associated with these works was captured in the survey data.

SIDRA modelling was undertaken to determine the performance of five intersections near the WMQ site:

- Botany Road, Buckland Street and Wellington Street
- Cope Street and Wellington Street
- Raglan Street and Cope Street
- Botany Road, Henderson Road and Raglan Street
- Henderson Road and Wyndham Street

The modelling shows that the Botany Road, Buckland Street and Wellington Street; Cope Street and Wellington Street; and Raglan Street and Cope Street intersections currently operate at Level of Service A (i.e. good operation) in the AM and PM peak traffic periods. The other assessed intersections currently perform at Level of Service C (satisfactory) or D (operating near capacity).

6.7.2. Construction

A Construction Traffic Management Plan (**CTMP**) has been prepared by PTC and is enclosed in **Appendix S**. The CTMP relates to the development of the central and northern precincts, as both development will be constructed concurrently. Its primary objectives include (but are not limited to):

- To minimise the impact of construction vehicle traffic on the overall operation of the road network;
- To ensure continuous, safe and efficient movement of traffic (pedestrian and vehicular) for both the general public and construction worker;
- To provide a description of the construction vehicles and the volume of these construction vehicles accessing the construction site
- To provide information regarding the changed access arrangements and a description of the proposed external routes for construction vehicles accessing and exiting the site.

Key components of the CTMP include:

- Construction vehicles will enter the WMQ site via gates located within the frontages to Botany Road and Raglan Streets.
- Temporary removal of on-street parking may be required
- Temporary local closures of footpaths will be required
- Work zones will be provided to allow for loading and unloading of materials.
- The site access arrangements and work zones will vary in accordance with the construction program and as works progress.
- Vehicles will enter and exit the site in a forward direction. Construction traffic and deliveries will be managed on-site to ensure that vehicles enter and exit using the correct gate. Deliveries will be scheduled to ensure construction vehicles are not marshalled on a public road.
- A range of vehicles will access the site during construction. Swept path assessments have been undertaken to confirm that vehicles can safely access the site. The largest vehicle to be used during construction will comprise an Articulated Vehicle (19m), which will utilise the proposed Work Zones (and not enter the construction site).
- The primary access route to the site will be via Botany Road from the north. Egress will be in a southbound direction along Botany Road. Contingency routes have also been identified for alternative access to the site.

The CTMP estimates that:

- The average daily number of trucks accessing the site will range from 24 – 36 vehicles during construction works.
- The peak number of daily trucks accessing the site will range from 48 – 72 vehicles during construction works. The construction traffic generation is anticipated to be less than the peak hour traffic generation of the operational development, which has been assessed and found to have no significant detrimental impact to the operation of the surrounding road network. Accordingly, it is anticipated that construction traffic will not have any significant impact to the road network operation
- All vehicles transporting loose materials will have the entire load covered and/or secured to prevent deposits onto the roadway during travel to and from the site.
- During the construction phase, work zones are required on the Botany Road frontage to facilitate loading and unloading of materials. Accordingly, footpath closures and/or diversions will be required to maintain pedestrian safety. This includes the footpath located along Botany Road between the Waterloo Congregational Church and Raglan Street.
- Barriers, fencing and signage will be installed to safely divert pedestrians away from areas of closed footpaths. The proposed pedestrian diversion routes are shown in the figure below.

Figure 44 Pedestrian diversion routes

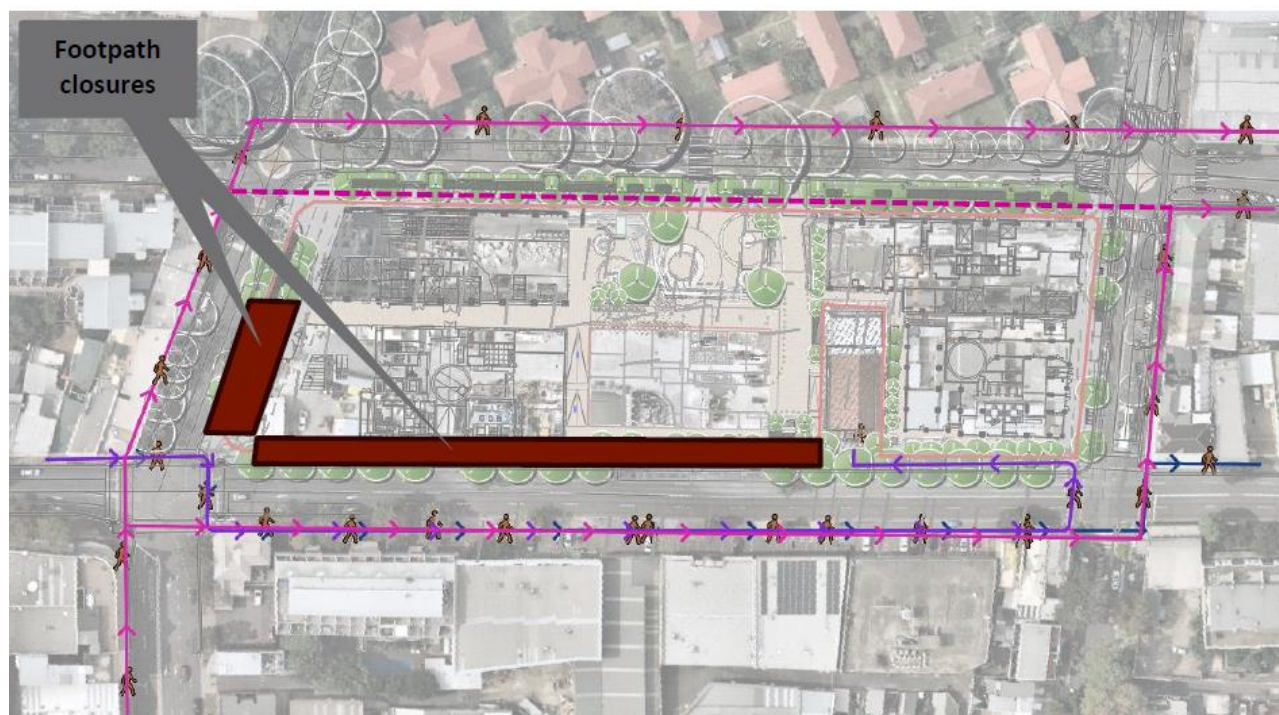


Figure 23 - Pedestrian diversion routes

Source: PTC (2025)

Limited car parking will be provided on site for construction works. All site personnel will be advised to not park on street parking within the vicinity of the development site. Construction workers will be encouraged to access the site via public transport or to carpool. Personnel will be informed of the public transport services readily available to access the site.

6.7.3. Operation

6.7.3.1. Pedestrian Access and Movements

A pedestrian modelling desktop assessment has been prepared by WSP (enclosed in the PTC Transport, Traffic and Parking Impact Assessment). The assessment has been undertaken to confirm that the proposed development can accommodate peak time pedestrian movements and that queuing for the bus stop can occur safely within the site without impacting other footpath users.

The pedestrian assessment has been based on the 2036 forecast pedestrian demands.

The assessment concludes that a Level of Service A is achieved in all of the assessed locations and that the proposed development can therefore safely accommodate peak time pedestrian movements and queuing associated with the adjacent bus stop on Botany Road.

6.7.3.2. Bicycle Parking

Bicycle parking for the proposed development will be provided within the shared basement, which is located below the northern and central precincts, and has been approved under a separate SSD (SSD-10438). The approved Basement SSD will be modified to align with the land use of the new northern precinct and central precinct detailed SSDs.

The bicycle parking for the co-living accommodation has been calculated on a first principles basis and informed by bicycle parking usage data gathered from a co-living operator's Sydney CBD sites. Provision has been allowed for fifty (50) cycle parking spaces, which is considered appropriate given utilisation rate in other developments as well Council's ambitions to ensure that at least 10% of total trips into the city are made by bicycle.

Bicycle parking is also provided within the basement for staff of the retail and childcare facilities. Additionally, spaces are proposed within the public domain for visitors to the site. The proposed provision is consistent the provisions of the Sydney DCP 2012.

End of trip facilities for staff will be shared between the central and northern precinct. These facilities will be located within the basement P1 level, next to the lift.

6.7.3.3. Car Parking

Parking for the WMQ site is provided within the shared basement.

The parking provision for the central precinct includes one (1) space for childcare staff and four (4) drop-off spaces for users of the childcare centre.

The drop off and pick up spaces are located adjacent to and directly opposite the childcare lift to provide a direct access route for children and parents. The crossing will be marked for safety. The drop off and pick-up spaces will be made available between the hours of 7:00am to 9:00am and 4:00pm to 7:00pm, Monday to Friday. The use of these drop off and pick-up spaces will be time restricted to a maximum of 15 minutes. The drop off and pick up spaces will be used as service / courier bays outside these hours. This is consistent with condition E28 of Basement SSD consent SSD-10438.

No parking will be provided for the retail, co-living accommodation, or community (excluding childcare centre) uses. This provision is justified given the site's high accessibility to public transport including Waterloo metro station (located within the WMQ site).

6.7.3.4. Traffic Generation and Road Network Impact

The traffic impact associated with the proposed development has been assessed in accordance with the Guide to Transport Impact Assessment and intersection survey data collected on 21st August 2025.

Traffic generation associated with the proposed development has been derived based on the level of on-site parking to be delivered under the basement SSDA (as modified).

Car parking will not be provided for the co-living accommodation, retail or community use (excluding childcare centre). Accordingly, zero trip generation is associated with these uses.

The childcare centre is anticipated to generate a total of 17 vehicle trips in the peak AM and PM periods.

The impact of the additional traffic generation associated with the proposed development as well as the northern precinct development (anticipated to generate 19 vehicle trips in the peak AM and PM periods), southern precinct development and existing church and metro has been considered as part of the Traffic Impact Assessment. In total, the WMQ development will result in 40 additional trips in the peak AM and PM periods (20 outbound and 20 inbound).

SIDRA modelling undertaken as part of the TIA considers the following scenarios:

- 2025 Existing (signal phasing to replicate conditions observed from date of traffic)
- 2035 without development (i.e. future base)
- 2035 with proposed development

The modelling demonstrates that the proposed development will not adversely impact the Level of Service of, or materially increase the average delay at, the assessed intersections.

The traffic associated with the proposed development is expected to be less than the approved SSDAs for the central and northern precincts and the cumulative impacts will be acceptable.

6.7.3.5. Loading and Servicing

Loading and servicing for the proposed development will be undertaken in the adjoining northern precinct. The northern precinct development includes provision for a refuse bay capable of accommodating a refuse vehicle, one medium rigid vehicle and one small rigid vehicle. Additionally, five (5) courier service bays (each sized to accommodate B99 vehicles) will be provided within the shared basement (at Level B1).

The proposed loading arrangements are consistent with the recommendations with the TfNSW Freight Forecaster and are considered fully appropriate for the WMQ site. The use of the loading and service bays will be managed through the implementation of a Freight and Servicing Management Plan (**FSMP**). A FSMP has been prepared for the central and northern precinct developments and is appended to the Transport, Traffic and Parking Impact Assessment prepared by PTC.

Access to the loading dock and service bays will be managed through an online booking system, which will allocate the times and durations vehicles will be allowed to access the site. This will ensure that bookings do not exceed the number of available bays for each time slot, thus managing vehicular access to the loading dock and service bays and minimise any potential queuing onto the external road network.

6.7.3.6. Green Travel Plan

A Framework Green Travel Plan (**FGTP**) has been prepared by PTC as part of the Transport, Traffic and Parking Impact Assessment. The purpose of the FGTP is to provide a package of measures with the aim of promoting and reducing the reliance of private car usage.

Mode share targets for the site are set out in the tables below.

Table 18 Mode share targets - employees

Mode of travel	Medium term target (5 year)	Long term target (10 year)
Train/Metro	50%	54%
Bus	20%	20%
Car (driver or passenger)	5%	1%
Bicycle	10%	10%
Walked only	5%	5%
Worked at home / did not go to work	9%	9%
Other mode	1%	1%

Source: PTC (2025)

Table 19 Mode share targets - residents

Mode of travel	Medium term target (5 year)	Long term target (10 year)
Train/Metro	40%	45%
Bus	20%	20%
Car (driver or passenger)	10%	5%
Bicycle	10%	10%
Walked only	10%	10%
Worked at home / did not go to work	9%	9%
Other mode	1%	1%

Source: PTC (2025)

The FGTP identifies potential strategies for increasing the uptake of public transport, active modes of travel and car sharing / car pooling to and from the site. Detailed measures to facilitate modal shift in travel behaviour will be confirmed as part of a future detailed Green Travel Plan to be prepared prior to the occupation of the development.

A Transport Access Guide has been prepared as part of the FGTP. The Transport Access Guide will inform staff and residents of the site on how to access WMQ via walking, cycling or public transport.

Monitoring of the GTP will occur on an annual basis to determine progress against the modal share targets and take up of bicycle parking.

6.8. Noise and vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by Stantec and is enclosed in **Appendix T**.

6.8.1. Existing Environment

The noise and vibration assessments undertaken have been assessed to the noise and vibration criteria established by the NS Environment Protection Authority.

Background noise levels at nearby noise-sensitive receivers and noise emission statistics associated with vehicle movements along Botany Road have been used to inform the noise and vibration assessment. These levels and statistics were derived from previous assessments undertaken in November 2019 and April 2020. These measurements are considered to provide a more representative baseline of typical traffic noise and ambient background levels under normal conditions than the present day, as construction works associated with the southern precinct remain ongoing. The 2019 assessment was undertaken prior to the Covid-19 pandemic and therefore represent typical background and traffic noise characteristics of the area.

6.8.2. Potential Impacts

Construction

The NVIA considers the cumulative construction noise and vibration impacts associated with the proposed development and the development in the northern precinct. The proposed construction hours are factored into the assessment.

The noise model represents the 'reasonable' worst case periods of construction activities, meaning that all the equipment of each stage is operating simultaneously during a 15-minute observation period.

The predicted noise levels at the surrounding noise catchment areas have been based on the assumptions and sound power levels of the equipment detailed in the NVIA. The prediction modelling was conducted for each of the following construction scenarios:

- Scenario 1: Early Works (northern and central precinct)
- Scenario 2: Structure (GF – L5):
- Scenario 3: Structure (L6 – L10) and Facade (GF – L5):
- Scenario 4: Structure (L11 – L20) and Facade (L6 – L10)
- Scenario 5: Structure (L21 – Roof) and Facade (L11 – L20)

The NVIA demonstrates that with the implementation of the identified mitigation measures the construction of the northern and central precinct developments (during any of the scenarios listed above) is not expected to result in an exceedance of the highly noise affected level (75dB) at any of the identified receivers.

Vibration

Vibrating equipment is expected to be used in close proximity to the Waterloo Congregational Church when pouring the Level 1 slab. Mitigation measures will be implemented to ensure vibration generated on the structure of the Waterloo Congregational Church does not exceed the project vibration requirements.

Operation

A road noise impact assessment was undertaken to assess the noise impacts of road traffic on the amenity of future residents of the co-living accommodation.

Project internal noise limits are established within the NVIA for the co-living accommodation. Different noise limits are identified for scenarios with windows closed and windows open.

To comply with the project internal noise limits (with windows closed), glazing components of the façade must meet the acoustic demand ratings specified within the NVIA. Thicker glazing is generally required on the co-living accommodation and childcare windows facing Botany Road to the west and the Waterloo Congregational Church to the south. Additionally, the solid/non-glazed elements of the façade are required to have an acoustic performance of no less than Weighted Sound Reduction Index (Rw) 55.

An open windows assessment has been conducted to assess whether the habitable spaces within the co-living accommodation can meet the project internal noise limits with windows open for natural ventilation. The assessment shows that some co-living units at each level of the proposed development cannot meet the project internal noise limits with windows open. Alternative means of ventilation may be required for these

units. A total of 203 (40.6%) of the co-living units are affected. The affected units are located along the western and southern elevations of the building. The number of affected units decreases at upper levels of the tower.

All habitable spaces not identified on the drawings may rely on opening their windows to achieve the natural ventilation requirements of the National Construction Code 2022 while simultaneously complying with the project internal noise.

Two (out of six) of the internal playrooms within the childcare centre will also be noise-affected (i.e. unable to meet the project internal noise limits with windows open). An alternative means of ventilation will be provided for these rooms with mechanical ventilation (in addition to openable windows) to meet the requirements of the National Construction Code and Australian Standards. The affected rooms are located along the western elevation of the building.

The outcomes of the road traffic noise assessment has been informed by the cumulative noise and vibrations impacts associated with the development in the wider WMQ site, including the increase in noise from the local road network associated with traffic generated by the proposed development.

The NVIA demonstrates that, based on the anticipated traffic generation, the proposed development is expected to give rise to a 1.1dB increase in traffic noise levels. This is fully consistent with the NSW Road Noise Policy as it is less than a 2dB increase.

Mechanical plant noise

The noise generated by the mechanical plant and equipment within the rooftop plantroom has been assessed to the noise sensitive receivers surrounding the proposed development within the noise catchment areas (and specifically the rooftop.

plantroom), with consideration given to the following assumptions:

- The mechanical plant and equipment will be operating during all periods in any given day.
- Typically, the load demanded of the mechanical plant and equipment will be reduced approximately 60% during the evening period (6:00pm – 10:00pm) and 40% during the night-time period (10:00pm – 7:00am). However, as a conservative approach, for this assessment, it have been assumed that the mechanical equipment to run at full capacity.

Based on the results of the assessment of the noise generated by the rooftop mechanical plant and equipment, the predicted noise levels at the surrounding noise-sensitive receivers are expected to comply with the project noise trigger levels established in the NVIA, based upon the implementation of mitigation measures detailed.

Childcare Centre noise

The NVIA also considers the likely impacts associated with noise generated by the childcare facility (i.e. use of the outdoor play spaces). The assessment demonstrates that the predicted noise levels associated with the use of the childcare centre at each of the identified noise-sensitive receivers are below the relevant noise criteria.

Retail tenancies noise

Noise emissions from the proposed retail tenancies and associated licenced outdoor seating areas will be assessed as part of the detailed fit-out applications for these spaces.

Metro impact – ground-borne noise / regenerated noise

An assessment of the ground borne noise into the nearest co-living and childcare space within the proposed development as a result of a train pass-by within the subterranean corridor has been conducted as part of the NVIA. Source vibration levels were provided by Sydney Metro. The metro tunnels are located approximately 15 metres from the basement slab.

The results shown in the NVIA demonstrate that the predicted structure borne noise levels associated with the operational of Sydney Metro comply with the relevant criteria. Additionally, it is also relevant to note that the track form designers are obligated to ensure that the track form is designed such that the requirements of the Transport and Infrastructure SEPP 2021 are met without any additional mitigation provided to the structure of the building.

A vibration impact assessment has been undertaken against the relevant Human Comfort and Structural Damage criteria to determine whether there will be any adverse effect on occupants of the development with regards to human comfort, or any potential structural damage to the building, as a result of a train pass-by within the subterranean corridor. The NVIA demonstrates that based on the results of the vibration dose value predictions, the vibration impact on the occupants of the proposed development is predicted to comply with the Human Comfort requirements set out within the Transport and Infrastructure SEPP 2021. Additionally, it is not expected that there will be any exceedance of the criteria established with regards to structural damage.

6.8.3. Mitigation measures

The following mitigation measures will be implemented during the construction and operational phases of the proposed development:

Construction

- 2m high solid acoustic barrier (Class A or Class B hoarding) surrounding the perimeter of the site will be installed during construction;
- Short-term vibration monitoring will be undertaken on the structure of the Waterloo Congregational Church during the Level 1 slab pour to ensure the vibration generated on the structure does not exceed the values for cosmetic damage structural damage outlined in British Standard 7385 and German Standard DIN 4150;
- Noise monitoring at Waterloo Congregational Church must be undertaken during construction of Ground Level to Level 5 and Level 5 to Level 10.
- Other measures to minimise noise and mitigate its impact, including the use of screening, silencers and alternatives to reversing / warning alarms will be considered.

Operation

- Acoustically rated glazing and solid facade elements will be installed to mitigate noise in the co-living units and spaces within the childcare centre. The solid façade elements must have an acoustic performance of no less than Rw 55;
- Acoustically treated mechanical ventilation devices will provide an alternative means of ventilation to spaces within the childcare centre and co-living spaces that are noise-affected and cannot rely on opening their windows to obtain natural ventilation;
- Acoustic barriers (solid or louvred) will be installed to mitigate noise emissions from mechanical plant and equipment within the Level 23 plantrooms. The barrier will have a height of at least 0.5m above the cooling towers. Additional mitigation measures will be determined once the plant has been selected.

Following the implementation of the proposed mitigation measures, the residual noise and vibration impacts are considered acceptable.

6.9. Flooding

A Flood Impact Assessment has been prepared by WSP and is enclosed in **Appendix W**. The assessment has been informed by discussions with City of Sydney's flood engineer and provides a comparison of the pre-development and post-development flood conditions. Flood conditions were assessed using the City of Sydney Council's flood model updated with the latest survey data available for the site and the proposed development. The model was used to simulate the 5% Annual Exceedance Probability (AEP), 1% AEP and the Probable Maximum Flood (PMF) events.

6.9.1. Existing Environment

The site is located at the top of the Alexandra Canal Catchment. Water runoff from the eastern part of the site drains to the south west. The western part of the site drains in a south / south-east direction.

Several low-lying topographical depressions within the catchment rely solely on the pit and pipe drainage system for surface runoff conveyance. Due to the influence of the natural terrain and surrounding

development, these areas are susceptible to water ponding and may experience flooding of roads and private properties during heavy rainfall events.

The area around the WMQ site is susceptible to flooding arising from overland flow during the 1% AEP flood event. Water ponding during this event occurs at the intersection of Cope and Wellington Street (located to the south east of the site) and in the southern part of the wider WMQ site. Localised ponding has also been experienced in 2010 and 2025 at the intersection of Botany Road with Buckland Street (to the south west of the site).

Flood modelling undertaken by WSP based on the latest survey data shows that the WMQ site and surrounding area is expected to be affected by flooding during the 5% AEP, 1% AEP and PMF flood events. Flood depths of up to 450mm in Botany Road and 600mm further south to the front of the Waterloo Congregational Church are identified in the 5% AEP flood event. Water depths increase to 1300mm along Botany Road (adjacent to the central precinct) during the PMF event.

The modelling shows that the maximum existing flood levels are experienced to the north of the site at the intersection of Raglan Street and Botany Road.

Flow velocities are below 1.5 m/s west of the Central Precinct at Botany Road during the 5% and 1% AEP flood events.

Flood hazard maps show that the flood hazard category for the area surrounding the central precinct is predominantly H1 (generally safe for people, vehicles and buildings) with some H3 category land located within Botany Road during the 5% AEP and 1% AEP storm events. During the PMF event H4 hazard areas (Unsafe for all people and vehicles) are predominantly expected to the west of Building 2 along Botany Road.

6.9.2. Potential Impacts

Flood conditions

The potential off-site flood impacts of the proposed development were assessed by WSP through hydraulic modelling considering changes in flood level, flow velocity and flood hazard. The modelling indicates that the proposed development will have a negligible impact on flooding. Flood impacts arising from the wider WMQ development are consistent with those previously identified and accepted as part of the original concept and detailed development applications for the site.

Minor and highly localised changes to flood levels and depths (of between 10mm to 30mm) are expected along Botany Road in the post-development scenario. However, Building 2 will not be affected by floodwaters during the 5% and 1% AEP events.

Changes in post-development flood levels observed in Cope Street and Raglan Street are not attributable to Building 2. These changes were previously assessed and approved as part of the previous development applications for the site.

Figure 45 Change in flood level - 1% AEP Flood Event



Source: WSP (2025)

Figure 46 Change in flood level - PMF event



Source: WSP (2025)

The proposed development will result in negligible changes in flow velocity on Botany Road around the central precinct. Flow velocities will remain below 1.5 m/s along Botany Road (adjacent to Building 2) during

the 5% AEP and 1% AEP events and less than 0.25 m/s in the PMF event. Changes in flow velocities in Cope Street and at the intersection of Cope Street and Raglan Street are a result of changes in street level that are not associated with this development application.

During the PMF event, flow velocities at Building 2 are expected to remain below 0.2m/s.

Figure 47 Change in flow velocity - 1% AEP flood event



Source: WSP (2025)

Figure 48 Change in flow velocity - PMF event



Source: WSP (2025)

Building 2 will not be affected by floodwaters during the 5% or 1% AEP events. During the PMF event, floodwaters may reach the ground floor level of the podium presenting up to H2 hazard levels.

Given the negligible changes to the flood depths and flow velocities adjacent to Building 2, the proposed development will not result in any changes to the existing flood hazard classification along Botany Road. In the 1% AEP flood event the site frontage along Botany Road will have a flood hazard category of H1 and H2. The public domain located to the west of the building will have a flood hazard classification ranging from 2 – 4 in the PMF event.

Climate change sensitivity analysis has also been undertaken to determine the possible effects of climate change on flood conditions. The approach to the sensitivity analysis is consistent with feedback received during pre-DA engagement with the City of Sydney's flood engineer. The sensitivity analysis shows that increases in flood depth of up to 50mm are anticipated across Botany Road. However, the increase does not affect Building 2 with the finished floor levels located above the 1% AEP + climate change level.

Accordingly, the climate change analysis does not identify any variations in flood hazard patterns.

Flood planning levels

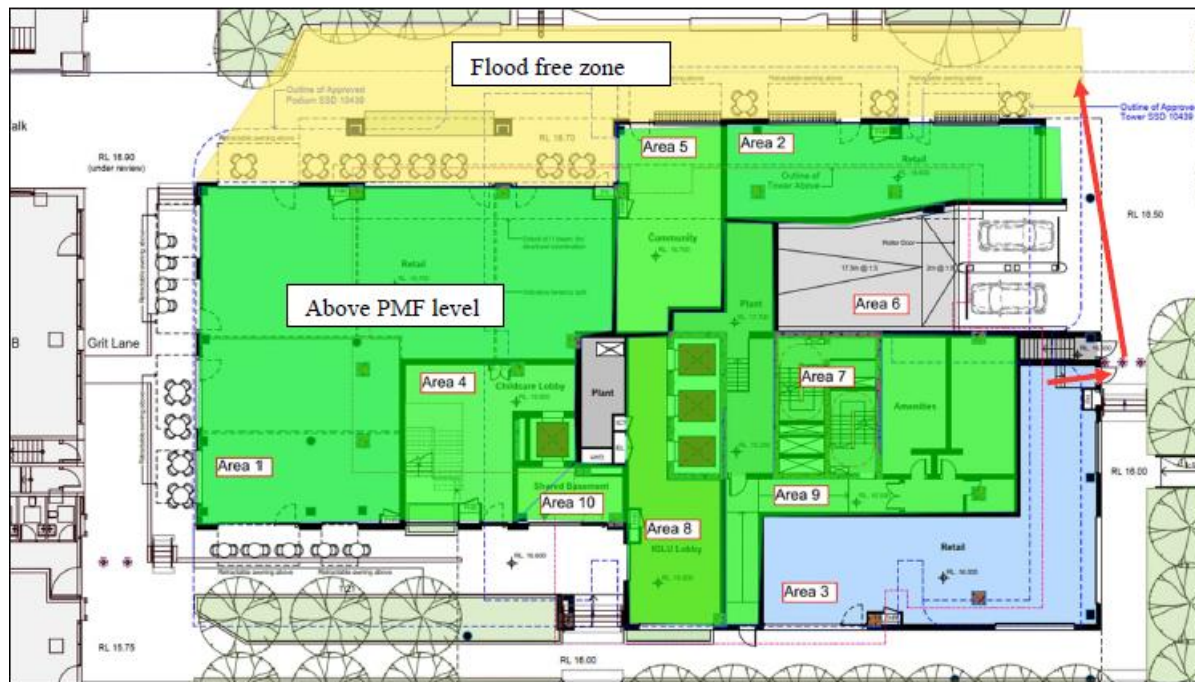
Flood planning levels for the proposed development have been defined in accordance with the Interim Floodplain Management Policy as follows:

- Retail - 1% AEP flood level with stepped-up zone inside property for shelter in place (evacuation for emergency response)
- Residential (i.e. Co-living) – 1% AEP flood level + 0.5m or PMF (whichever is higher) for habitable rooms and 1% AEP flood level for non-habitable rooms (N.B – all co-living floorspace except for the lobby is located above ground floor level).

The proposed finished floor levels (FFL) for the development meet or exceed the required flood planning levels. The FFLs for all areas of the ground floor plane, except the retail tenancy proposed in the south-western corner of the site, are also above the PMF level.

Occupants of the south-west retail tenancy (sub-area 3) will be required to evacuate to areas above the PMF flood level (either internally within the building or outside) during a PMF event. Occupants will evacuate from the tenancy via the exit located on the southern elevation of the building to the flood free zone to the east of Building 2 as shown in the figure below. A Flood and Emergency Evacuation Plan will also be prepared prior to the issue of an occupation certificate for the relevant tenancy.

Figure 49 Flood emergency response



Source: WSP (2025)

6.9.3. Mitigation Measures

The following mitigation measures are proposed:

- A Flood and Emergency Evacuation Plan must be prepared prior to the occupancy of the relevant tenancy. The plan must document how people can be evacuated and remain safe during a flood emergency.

Following the implementation of this mitigation measure the proposed development is considered acceptable from a flood risk perspective.

6.10. Heritage Impact

A Heritage Impact Statement (HIS) has been prepared by Urbis (refer to **Appendix Y**) to address the impacts of the proposed development on the heritage significance of the site and surrounding areas.

6.10.1. Existing environment

The Waterloo Congregational Church located directly to the south of the central precinct is heritage listed (local significance). Additionally, there are several other heritage items within the vicinity of the site including:

- "Cauliflower Hotel including interior" located at 123 Botany Road, Waterloo (local significance)
- "Terrace Houses" located at 229-231 Cope Street, Waterloo (local significance)
- "Former Waterloo Pre-School (225 Cope Street) including interior" located at 225-227 Cope Street, Waterloo (local significance)
- "Former CBC Bank including interior" located at 60 Botany Road, Alexandria (local significance)
- "Cricketers Arms Hotel including interior" located at 56-58 Botany Road, Alexandria (local significance)

- “Duke of Wellington Hotel including interior” located at 291 George Street, Waterloo
- “Electricity Substation 174”, 336 George Street, Waterloo
- Potts Hill to Waterloo Pressure Tunnel and Shafts (state significance)

The Alexandria Park Heritage Conservation Area is located to the west of the Waterloo Metro Quarter site and is significant for demonstrating the growth of Alexandria in the late nineteenth and early twentieth centuries. The Redfern Estate Heritage Conservation and Waterloo Heritage Conservation Area are located to the north and south of the WMQ site respectively.

6.10.2. Potential Impacts

The proposed development does not include any physical works to the Waterloo Congregational Church, which will be wholly retained and conserved in its existing form.

The HIS considers that the proposed development will enhance the public's appreciation and interpretation of the heritage significance of the church by establishing an expanded setting and curtilage for the building compared to existing conditions.

Views to the church building from the north will be partly obscured by the proposed development. However, clear views to the church from the north did not exist prior to the commencement of the wider WMQ development as the historic (now demolished) buildings along the Botany Road frontage were built to the property boundary and sat forward of the church.

Taking into account the historic conditions, new views and vistas towards the church building will be introduced by the proposed development. These will enhance the visual connection in the 'undeveloped' visual and pedestrian corridor linking the church with Cope Street Plaza. This improved view corridor will allow more people to visually connect with and interpret the Waterloo Congregational Church's history, integrating the building meaningfully into the development.

The proposed podium is set back from Botany Road in a manner that aligns with the front face of the church and will have a similar height to that of the paired pinnacles. Accordingly, the proposed podium will respect the historical frontage, visual integrity and prominence of the church in the streetscape.

The scale, form and sitting of the proposed development will not have any adverse impacts on the significance of the other heritage items located within the vicinity of the site or the nearby heritage conservation areas.

Additionally, the proposed materials including the glazed ceramic tiles and terracotta-coloured finishes on the upper levels will respond to the character and appearance of the historic built environment

Accordingly, the proposed development is considered acceptable from a heritage impact perspective and mitigation measures are not required.

6.11. Social Impacts

A Social Impact Assessment (SIA) has been prepared by Urbis (refer to **Appendix BB**) in accordance with DPHI's *Social Impact Assessment Guideline* (2023). The SIA was informed by targeted community and stakeholder consultation including in-depth interviews with key stakeholders (RedWatch, Counter Point, representatives from the City of Sydney Council) and a community survey of local residents and businesses (twenty nine responses).

6.11.1. Existing environment

The SIA describes the WMQ social baseline as detailed below:

- The site is well-serviced by district and local infrastructure, including local services for Aboriginal people, green spaces, a library, a community garden and several medical centres.
- The surrounding suburb contains a wide mix of non-residential uses including food and beverage outlets, retail, childcare, gyms, wellness and allied health services.
- The population is expected to increase by 31.6% between 2021 and 2041, with strong representation from younger working age cohorts, particularly people aged 25-34 years.

- The local area comprises predominantly low and middle-income earners and households living in high-density dwellings.
- Crime rates are comparatively high, reflecting the area dense urban character of the area.
- Residents have high public and active transport usage, with a low number of residents commuting via vehicle or owning a motor vehicle.

6.11.2. Potential impacts

The SIA identifies that the proposal will deliver predominantly positive social outcomes:

- The proposed development will contribute to increased housing diversity within a well-connected area
- Co-locating high-density residential accommodation, community and other uses with active and public transport options, including direct access to the metro station, will enhance accessibility and connectivity to employment, retail and service centres.
- The proposal will help foster a safe and connected community by integrating the recommendations of the CPTED report into the design to address local crime concerns.
- The proposal will support improvements to livelihoods by contributing to the local economy and improving access to employment opportunities.

Cumulative impacts from concurrent construction in the area have been considered. The SIA recommends management measures to minimise disruption and identifies that, in the longer term, the development will make a significant positive contribution to local housing supply and diversity.

The SIA notes that several mitigation measures have been incorporated into the proposed development to mitigate negative social impacts. The SIA also makes additional recommendations for the Applicant to consider to further enhance positive social impacts including:

- Ongoing engagement and communication with the community to inform the subsequent stages of the proposal.
- Ongoing engagement with the Waterloo Congregational Church during the construction phase
- Design the communal areas of the co-living accommodation with reference to the Connecting with Country Guidelines prepared by Murawin.
- Develop a Plan of Management in collaboration with the co-living provider
- Implementation of CPTED measures into the development.
- Consider developing a retail tenancy selection criteria that prioritises commercial and retail tenants that meet the needs of the existing and future community

Therefore, the proposal will result in a positive social impact and any temporary negative impacts during construction can be appropriately managed through the implementation of the mitigation measures proposed in other technical reports.

6.12. Other impacts not requiring detailed assessment

This section of the report addresses the matters which require a standard impact assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

Table 20 Standard Assessment Matters

Issue (per SEARs)	Assessment	Mitigation
Biodiversity	A Biodiversity Waiver Request has been prepared by WSP and was submitted to DPHI on 19th August 2025. The Waiver Request demonstrates that the proposed development is unlikely to have a significant impact on threatened species or their habitats. It notes that: ▪ All vegetation, buildings and structures have already been cleared as part of the CSSI approval and as such there will be no impacts to vegetation abundance or integrity from the project. ▪ The site does not contain habitat that would support threatened species or ecological communities, being previously cleared of all native vegetation and recently redeveloped with the new metro station. ▪ The site is not part of a recognised movement corridor between breeding grounds, foraging grounds, or other habitats important for the lifecycle of species such as staging points for migration. The site is within a heavily urbanised area and as such barriers to movement, habitat fragmentation and flight path integrity are not likely to be significantly altered by the proposed development. ▪ Water quality, water bodies and hydrological processes do not sustain threatened species at the site. A waiver was subsequently granted by DPHI on 15th September 2025. Accordingly, no further assessment of biodiversity impacts is required.	N/A
Contamination	The proposed development is subject to the approved CSSI remediation strategy. Remediation will be carried out in accordance with the relevant conditions of the CSSI approval and approved basement SSDA. Remediation works is not required or proposed under this SSD. Nevertheless, subject to completion of remediation works, the proposal is suitable for the site.	N/A
ESD	An Ecologically Sustainable Development (ESD) Report and Sustainability Strategy has been prepared by Cundall and is enclosed in Appendix Q. The report has been prepared to address item 10 of the SEARs by demonstrating how the proposed development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards and how greenhouse gas emissions have been minimised. The Applicant is committed to achieving a 5 star Green Design and As-built (V1.3) rating for Building 2 and an	

Issue (per SEARs)	Assessment	Mitigation
	overall 6 star Green Star (communities) rating for the WMQ precinct. The proposed development is designed to reduce greenhouse gas emissions through eliminating fossil fuels, an efficient design, renewable energy procurement, and lower embodied carbon construction, as well as through reduced water demand and waste to landfill. Initiatives consistent with national best practice will be implemented to minimise consumption of resources and to ensure the delivery of a sustainable development including (but are not limited to): ▪ The proposed building will be 'all-electric' (i.e. no gas connections are proposed') ▪ A range of passive design measures are proposed including: – Building façade design designed to optimise wall/glazing ratios, glazing performance, shading and insulation; enhance thermal comfort; and reduce heating and cooling loads – Natural ventilation provided to the co-living units ▪ Energy efficient domestic hot water - electric heat pumps will be used for domestic hot water ▪ Energy efficient heating, ventilation and air conditioning systems will be selected with room key controls to turn off the air-conditioning system when the co-living units are vacant ▪ Energy efficient lighting with zoned control, occupancy sensors and / or daylight dimming ▪ Energy efficient lifts will be installed ▪ Greenhouse gas emissions will be offset in-line with Green Star requirements ▪ Photovoltaic panels will be installed on the roof top to produce on-site renewable energy ▪ Water efficient fittings, fixtures and appliances will be installed ▪ Landscaping and plant selection has been designed to minimise irrigation demand ▪ Water-sensitive urban design measures to reduce stormwater run-off and water pollution will be implemented. ▪ Waste during construction and operation will be managed in accordance with the measures set out in the Waste Management Plan prepared by WSP.	

Issue (per SEARs)	Assessment	Mitigation
	- Green roofs, planted terraces and landscaping throughout the public domain will enhance local biodiversity and minimise the urban heat island effect - Provision of a childcare centre on the site - Inclusion of public art prepared by indigenous artists. By incorporating a range of ESD initiatives, the proposed development is fully consistent with the relevant objectives of the Waterloo Design and Amenity Guideline, which promote the creation of an integrated and sustainable infrastructure network; and encourage sustainable water use and reduction in energy consumption and emissions.	
Ground and water	The development proposed as part of this detailed does not involve any below ground works. Below groundworks will be undertaken pursuant to the basement SSDA (as modified). Notwithstanding, for completeness a Geotechnical Interpretive Report has been prepared by WSP to address SEAR 14. The surface and groundwater impact assessment of the associated basement development were previously assessed and approved as part of SSD-10438. The WSP report concludes that the central precinct development now proposed will not alter or extend the findings of the previous assessment as no below-ground works are proposed. Accordingly, from a geotechnical perspective, the site is considered suitable for the proposed development, subject to the adoption of the design parameters and recommendations for the Basement SSDA.	Development is to accord with the identified geotechnical design parameters
Waste Management	A Construction and Operational Waste Management Plan has been prepared by WSP and is enclosed in Appendix X. <u>Construction</u> A 95% diversion rate from landfill for waste generated by construction activities will be targeted across the site. Wherever possible, construction waste will be stored and sorted on-site, including within collection zones for each waste stream. Waste collection will be undertaken during construction by private collection contractors on an as-required basis. <u>Operation</u>	The following mitigation measures are proposed: - Facilities management will provide education to future residents regarding correct waste disposal practices and general waste management. - Signage will be provided to waste rooms, bins and chutes. Signage must be clearly marked with clear instruction of

Issue (per SEARs)	Assessment	Mitigation
	The estimated waste to be generated by the proposed development once operational is as follows: Childcare General waste: 5,635 L/week Co-mingled: 2,818 L/week Paper / Cardboard: 2,818 L/week Organics: 1,691 L/week Co-living General waste: 30,408 L/week Co-mingled: 30,408 L/week Paper / Cardboard: N/A Organics: 30,408 L/week Retail General waste: 2,702 L/week (food) and 298 L/week (non-food) Co-mingled: 3,860 L/week (food) and 142L/week (non-food) Paper / Cardboard: 9,650 L/week (food) and 1,846 L/week (non-food) Organics: 2,702L/week (food) and 298 L/week (non-food) During the operation of the proposed development, waste will be sorted on-site by building occupants as appropriate into the following waste streams: Garbage (General Waste); Commingled Recycling; Paper/Cardboard; Organics; Bulky Waste / Electronic Waste; Charity. The co-living tower will be fitted with a set of dual chutes dedicated to garbage and commingled recycling. The dual chutes will terminate directly within 1100L bins within the site-wide basement. A bin changeover unit will be provided at the termination point of each chute. Provision for plastic lined garbage and co-mingled recycling bins for the temporary holding of waste will be provided for each retail tenancy and the childcare facility. Each tenancy will allow for the temporary holding of bins with sufficient capacity to hold one day's worth of waste. Staff or cleaners will transfer waste from these bins directly to the 1100L bins within the respective waste room.	acceptable and non-acceptable materials. ▪ The collection contractor will be responsible for providing regular waste collection reports outlining waste collection details of the site. ▪ Facilities management will be responsible for collating key outputs of the waste reports and providing a summary to residents ▪ Contamination will be monitored by the collection contractor and monitored.

Issue (per SEARs)	Assessment	Mitigation
	Waste rooms for the childcare and co-living uses are located within the shared basement. A shared waste room for the Building 2 and Building 1 retail tenancies is provided at ground floor level in the northern precinct. Provision will also be put in place for the disposal of large cardboard from the tenancies. Spaces for bulky waste associated with the co-living and childcare uses will be provided in the shared basement. Bulky waste will be transferred from the upper levels via the lift and supervised by building management. The waste storage areas will exceed the minimum required area based on the number of bins needed to service the development. Waste collections for the co-living accommodation, childcare facility and retail tenancies will be undertaken up to three times per week by a private contractor (with the exception of organic waste, which will be collected up to 5 times per week). All waste collections will occur from the loading zone. An assessment against the relevant provisions of the Sydney DCP is included within the WMP. The assessment demonstrates that the proposed development is consistent with these provisions.	
Water management	Minor storm events (5% AEP and below) will be managed through the proposed stormwater conveyance system, which will comprise of underground pits, pipes, a rainwater tank for roof drainage, water quality treatment device and an on-site detention tank (OSD). In major storm events (1% AEP and above), excess water will flow overland via the road kerb and gutter system at Botany Road. The OSD tank will be located to the south of Building 2. The OSD tank will provide a total storage volume of 80.1 cu.m for the stormwater event up to 100-years ARI, with a peak captured flow rate of 41L/s, which will comply with Sydney Water's requirements for detention volume and permissible discharge rates. DRAINS modelling has been undertaken to ensure that the OSD complies with the overall permissible site discharge for the wider WMQ. This has been achieved by restricting flows from the OSD tank using orifice plates installed over the primary outlet pipes or discharge chamber pit. The	Sediment and erosion control measures must be implemented during construction works. These measures may include: ▪ Installing a temporary site security fence ▪ Erecting sediment fencing downstream of disturbed areas and topsoil stockpiles ▪ Implement dust control measures such as covering stockpiles, installing fence hessian,

Issue (per SEARs)	Assessment	Mitigation
	legal point of discharge for the OSD tank will be to the west of Building 2 connecting to the existing 750 mm diameter pipe located in Botany Road. A stormwater treatment train including a 30kL rainwater tank (for re-use), water quality chamber, treatment devices and the OSD balance tank will be implemented. The primary treatment measure incorporates the use of Stormfilter Cartridges (PSorb units by Ocean Protect). Roof and pavement runoff will be directed to the water quality chamber located at the site boundary. MUSIC modelling has been undertaken that demonstrates that the proposed treatment train will ensure that the proposed development complies with the relevant (Sydney Water, City of Sydney and Green Star) post-development water quality targets. The proposed wastewater management strategy for Building 2 will ensure that all sanitary and trade waste discharges are effectively collected, treated and conveyed to the Sydney Water sewer system in compliance with AS/NZS 3500.2 and Sydney Water requirements. The inclusion of pump-out pits with emergency storage, along with trade waste pre-treatment devices, provides safeguards against environmental impact, operational failure and non-compliance.	and watering exposed areas - Placing hay bales or mesh and gravel inlet filters around existing drains and inlet pits - Locating stockpiled material, - including topsoil, as far away as possible from natural watercourses or temporary overland flood paths and stabilising all stockpiles and embankment through hydroseeding or hydro mulching. - Detailed erosion and sediment control measures will be confirmed prior to the issue of the relevant Construction Certificate.
Airspace	The proposal intrudes into prescribed airspace for the Sydney Airport. The previous proposal received approval from the Federal Government's Airspace Protection branch for multiple building intrusions across the site to a maximum height of 116.9 metres above the Australian Height Datum (AHD), which includes all lift overruns, vents, chimneys, aerials, lightning rods etc. The proposed building complies with the maximum height control and therefore the previous airspace approval remains relevant to the site.	Buildings must not exceed a maximum height of 116.9m AHD, including all lift overruns, vents, chimneys, aerials, antennas, lightning rods, rooftop garden planting etc.
Infrastructure and Utilities	A services and utilities infrastructure report is enclosed in Appendix AA. The report assesses the utility requirements of the proposed development and its impact on existing services. The report notes that the revised central precinct and northern precinct developments will result in an increased potable water, wastewater and electrical demands compared to the previously approved development for the site due to the proposed co-living use, which is associated with higher consumption relative to more typical residential development.	- The following works must be undertaken: - An updated Section 73 Notice of Requirements is required to confirm whether any additional amplifications or modifications to the

Issue (per SEARs)	Assessment	Mitigation
	Potable water The proposed development is anticipated to generate an estimated potable cold water demand of 219.44kL per day. An existing potable water network is located along Botany Road to the west of the site and includes a DN150 cast iron cement-lined main, which is currently being amplified to a DN200. A water main to the south of the site along Wellington Street is also currently being upsized to DN200. The proposed development will connect to this existing infrastructure at a point located approximately 132 metres south of Raglan Street. The current design for the potable water connection route has been developed in accordance with Sydney Water requirements and maintains adequate clearance from existing utility infrastructure. The design of the connection route will be refined by the project Water Service Co-ordinator during the detailed (construction) design phase. Sewer The central precinct's expected wastewater discharge is estimated to be approximately 197.49kL / day. The proposed development will connect to the existing 225mm vitrified sewer main on Botany Road (located approximately 126 metres to the south of Raglan Street). The detailed design of the proposed connection will be prepared by the project Water Service Co-ordinator following lodgement of the SSDA. The new development is anticipated to result in increased wastewater flows when compared the previous approval. The proposed central precinct development is anticipated to generate a total wastewater discharge of 84kL per day. Accordingly, a new Section 73 Notice of Requirements will be submitted to Sydney Water for reassessment to confirm the requirement for any amplifications and/or diversions to the existing sewer network. Electrical The central precinct and the northern precinct's buildings have been designed to a proposed maximum demand of 5,490 MVA/phase. A shared chamber substation room will be located within the northern precinct.	existing potable water network are required. - Proceed with Sydney Water Notice of Requirements (NoR) applications for the central precinct, and associated conditions of consent for the connection of Potable Water and Sewer. - Proceed with Ausgrid Contestable works approval process for central precinct building, and associated submissions and approvals for the connection of high voltage power and construction of the substation. - Proceed with NBN and selected Telecommunications providers applications for communication connections for the central precinct. Also address any associated utility authority conditions required for the connection of communications services. - During the detailed design development phase, space-proof the proposed service connections and associated modifications to ensure designs are

Issue (per SEARs)	Assessment	Mitigation
	The existing Ausgrid network comprises of underground low and high voltage assets located beneath Wellington Steer, Botany Road and Raglan Street. An offer to provide design-related services has been formally submitted to Ausgrid for the design and installation of three (3) 1500kVA surface-mounted chamber-type substations. It is anticipated that these chamber substations will be connected to Panel 34 of the Camperdown Substation. This proposed connection arrangement will be subject to confirmation in subsequent design phases. Two Ausgrid-certified designs have been completed by WSP to facilitate the high-voltage connections for the proposed development. A new connection application has been submitted to Ausgrid. Any additional requirements or amendments identified by Ausgrid will be addressed by WSP's Accredited Service Provider Level 3 designer during the construction design phase. Communication It is anticipated that 6 x P100 communications conduits and two communication carriers will be required for the proposed development. A single lead-in connection will be provided to a shared data room serving both the northern and central precinct developments. This design and the requirement for any amplification to the existing communications network will be confirmed during the construction design phase. New telecommunications services required for Building 2 may utilise existing conduits located along the eastern side of Botany Road. Impacts to the existing Telstra infrastructure located outside of the site boundary are considered unlikely.	coordinated and clash free.
Construction Environmental Management	A preliminary Construction Environmental Management Plan has been prepared which sets out details of the proposed site hoarding; security arrangements; worker amenities; and traffic and pedestrian management during the construction works. Construction hoarding will be installed around the perimeter of the central precinct during construction works to minimise impacts of the proposed works to adjoining public domain. The site perimeter will be secured at all times with no unauthorised access permitted.	- Construction waste must be managed in accordance with a detailed Construction Waste Management Plan - Noise generating activities can only be undertaken during standard construction hours.

Issue (per SEARs)	Assessment	Mitigation
	Traffic control will be provided at the site access gates and work zones to ensure that all vehicle deliveries and loading / unloading is safely undertaken with minimal impact on traffic around the site. Work zones will be provided along the site's Botany Road frontage. No construction worker parking will be provided on the site.	▪ Vibration sensitive buildings must be protected as far as reasonably possible during construction works. ▪ Air quality impacts must be minimised or avoided by applying appropriate dust suppression and air quality control measures during construction. The construction site layout and placement of plant must have regard to air quality impacts to nearby receivers, pedestrian, commercial receivers, public and road traffic. ▪ Erosion and sediment control measures must be implemented during construction ▪ A stakeholder management plan must be developed and community members/stakeholders must be engaged to minimise potential for negative impacts on the community during construction.
Security Risk Assessment	A Security Risk Assessment has been prepared by Connley Walker and is enclosed in Appendix FF. The SRA has been prepared in accordance with the Australian Standard for Risk Management and the NSW Police publication "Safe Place: Vehicle Management: A comprehensive guide for owners, operators and designers". The report identifies and assesses the security risks to the proposed development, including those associated with terrorism. The WMQ is a higher risk category (relative to other similar developments) due to the presence of the metro station within the site.	▪ CCTV must be installed within all public spaces ▪ Access control must be installed to the Childcare facility ▪ CCTV must be provided to the Childcare facility ▪ Implementation of CPTED measures

Issue (per SEARs)	Assessment	Mitigation
	To mitigate these risks, CCTV will be installed throughout the development. A range of CPTED measures are also incorporated within the design of the development as detailed above.	
BCA and accessibility	A BCA and DDA Assessment Report has been prepared by BM+G and is enclosed in Appendix H . The report contains an assessment of the proposed development against the deemed-to-satisfy provisions of the Building Code of Australia. Fire safety engineered Performance Solutions and other Performance Solutions will be required. Notwithstanding, the report concludes that the proposed development is capable of achieving compliance with the BCA.	N/A
Structural	A Structural Report (Appendix GG) has been prepared by Robert Bird Group. The report confirms that the structural design of the proposed development is compliant with the relevant criteria.	N/A
Reflectivity	A Solar Reflectivity Report has been prepared by RWDI (refer to Appendix K), which assesses the potential thermal and solar glare impacts arising from the proposed development. It concludes that: ▪ The proposed central precinct development as well as the northern precinct development will not create significant additional heat loads in adjacent buildings. ▪ Glare resulting from the proposed development (and northern precinct development) at surrounding receptors will be lower than the veiling luminance threshold with the exception of one location (a westbound driver on Raglan Street). At this location potential glare will exist for up to 1 minute per day during the afternoon in mid-March and late September (i.e. less than 0.01% of the daytime annually). The potential glare will occur at times when drivers already experience intense glare from the sun, likely reducing the perceived impact of any reflected light from the development.	N/A

7. Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development. It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. Project Design

The proposed development responds to, and is fully consistent with, the second amending concept DA that has been submitted concurrently to this application. The scale, massing and form of the proposed development complies with the building envelope set out within the second amending concept DA and will form part of a cohesive Over Station Development across the WMQ site.

The central precinct will integrate seamlessly with the northern precinct and the southern precinct development. The design of the central precinct promotes permeability and connectivity across the WMQ site by creating new public open space, respecting the adjoining heritage item and provides a transition of tower height across the WMQ.

Building 2 will comprise a high-quality and contemporary development that is fully compatible with its surrounding context. The development has been subject to a robust state design review panel process and displays design excellence in accordance with the Sydney LEP 2012. The proposed development addresses the relevant provisions of the Waterloo Design and Amenity Guideline. The range of materials and finishes proposed will provide an attractive and contemporary appearance that positively contributes to the emerging character of the area.

The mix of uses proposed within the central precinct responds to market conditions and addresses an urgent need for more housing and diverse housing, including an anticipated growth in the co-living sector. Five hundred co-living units will be provided within the site. Future residents will benefit from a high level of amenity through the provision of generous communal areas as well as high quality public domain within the site. The retail and community uses at ground floor and Levels 1 and 2 will activate the podium and serve the on-site population.

The proposed development incorporates large setbacks and comprises a sensitive response to the adjacent Waterloo Congregational Church and residential building to the north. Building 2 will incorporate a range of ESD measures and will minimise overshadowing to public open space within the vicinity of the site.

7.2. Strategic Planning Consistency

This EIS has demonstrated that the proposal is consistent with the strategic framework and has been considered against key Government and Council documents including the following:

- Greater Sydney Region Plan – A Metropolis of Three Cities.
- Our Greater Sydney 2056: Eastern City District Plan.
- NSW Better Placed
- State Infrastructure Strategy 2018 – 2038
- Future Transport 2056
- City of Sydney Local Strategic Planning Statement (City Plan 2036)
- Housing for All – City of Sydney Local Housing Strategy
- Sustainable Sydney 2030-2050

All levels of strategic planning seek to facilitate additional housing (including diverse and affordable housing) and 'transit oriented development' through the '30 minute city' concept. The proposal meets these objectives, given it:

- will provide 500 co-living housing units in a highly accessible location above the Waterloo metro station to provide affordable and diverse housing options for future residents.

- it would contribute to the provision of additional accommodation in a location which reinforces the '30-minute city' concept proposed by the Greater Sydney Commission, locating dwellings and employment in a location which is proximate to services, open space, transport and jobs.
- allow for a transit oriented development of a significant scale to be located directly above the metro station consistent with the key directions in the East District Plan.
- maintain the employment generating, non-residential floor space within the podium to activate the ground plane and provide a balanced mix of land uses.
- enhance the public domain and pedestrian experience, fostering community interaction and creating liveable, sustainable communities.

The proposal results in an orderly and economic use of the land that leverages significant NSW Government investment in public transport to the site, specifically Sydney metro. The mix of uses provides activation through various times of the day, optimising use of the new metro infrastructure throughout the day.

In conclusion, the proposal aligns with the strategic planning objectives by enhancing housing diversity and affordability in proximity to public transport. The Applicant has invested in a (GA NSW endorsed) design excellence process to ensure that future built form on the site will achieve the vision set out in strategic documents.

7.3. Statutory Planning Consistency

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix II**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised in the table below.

Table 21 Statutory Planning Consistency

Matter	Consistency
Objects of Act – EP&A Act s1.3	The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act and addressed in Appendix II .
Evaluation of development application (s4.15) – EP&A Act s4.40	The proposed development has been evaluated in accordance the relevant matters for consideration under s4.15(1) of the EP&A Act as outlined in Appendix II .
Compliance with environmental assessment requirements – EP&A Regulation s.191	This EIS has been all matters identified in the SEARs as outlined in Appendix A .
Principles of Ecologically Sustainable Development – EP&A Regulation s.193	
The precautionary principle	The proposed development will not present any threat of serious or irreversible damage. The proposed landscaping will create new habitats on site that support local ecology and biodiversity. Additionally, the proposed development will implement climate change adaptation principles and apply industry best practice ESD initiatives and third-party certification including Green Star Design and As-Built v1.3 and Green Star Communities.
Inter-generational equity	The proposed building and open space within the central precinct, as well as those across the wider WMQ, will provide healthy internal and external environments for workers, residents and visitors today and in the future. The proposed landscaping will deliver benefit to both current and future generations. Additionally, the use of fossil fuels has been minimised through energy efficiency initiatives. The WMQ buildings will have a fossil fuel free transition strategy to allow them to be powered by low carbon and/or renewable energy sources in the future.

Matter	Consistency
Conservation of biological diversity and ecological integrity	The site is of low ecological integrity. However, an extensive landscaping strategy has been developed for the wider WMQ site including the central precinct, which includes tree planting and landscaping within the communal open spaces, public domain areas, and along the street frontages, as well as the inclusion of green roofs. The planting selection prioritises native species and responds to the different site conditions. Tree and understorey planting will provide a rich diversity of endemic species and contribute to enhancing local biodiversity.
Improved valuation, pricing and incentive mechanisms	The design of Building 2 will reduce energy and water consumption and greenhouse gas emissions. Life cycle costing will also be used during the construction design process to justify capital investment and reduce ongoing impacts. Environmental goals have been established using industry recognised rating tools which are designed to deliver beneficial environmental and social outcomes during construction and operation.

7.4. Community Views

Community and stakeholder engagement has been undertaken by Ethos Urban and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants; and
- Government agencies and utility stakeholders.

This engagement was consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects*. The feedback received has been incorporated into the design and assessment in the EIS.

In accordance with the EPA Regulation, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the Applicant will respond to any matters raised by notified parties.

7.5. Environmental Impacts

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined in the summary table below.

Table 22 Environmental Impact Summary

Matter	Summary
Impacts on the natural environment	The proposed development will not result in any adverse environmental impacts on the natural environment. A BDAR waiver has been obtained from DPHI, which confirms that the proposed development is unlikely to have a significant impact on threatened species or their habitats and no further biodiversity assessment is required. Generous landscaping including tree planting and green roofs is proposed within the central precinct, which will contribute to enhancing local ecology. A stormwater conveyance system will be implemented to manage stormwater runoff from the site. The system will ensure that the proposed development complies with the relevant stormwater quality targets. Sediment and erosion control measures will also be implemented during the construction phase to minimise impacts of watercourses.

Matter	Summary
Impacts on the built environment	Design: The proposed development has been subject to a State Design Review Panel process. The design of the development addresses the feedback received from the panel and is considered to display design excellence. Overshadowing: The proposed built form responds to the Waterloo Design and Amenity Guideline and will minimise overshadowing to Alexandria Park, Cope Street Plaza, the future Waterloo Estate Park and surrounding residential areas. The proposed development is fully compatible with the site's surroundings and will have a high-quality and contemporary appearance that will positively contribute to the character of the area. Landscaping: Generous public domain incorporating tree planting and other landscaping is proposed across the central precinct, contributing to a high level of amenity within the site. Pedestrian wind safety / comfort: With the incorporation of the mitigation measures and proposed landscaping, the development will achieve safe and comfortable wind conditions which are consistent with the Waterloo Design and Amenity Guideline and will deliver a high level of amenity for future public domain users and tenants. Visual impacts: the visual impacts of the proposed development are acceptable. The proposed development does not block any views to areas of unique scenic quality and has a high level of compatibility with the surrounding visual context, which is highly urbanised and includes several towers of a similar scale, form and height. Heritage: The proposed development will respect the significance of the Waterloo Congregational Church and will not have any adverse impacts on other heritage items located within the vicinity of the site or the nearby heritage conservation areas. The proposed materials respond to the character and appearance of the historic built environment and the development is considered acceptable from a heritage impact perspective. Flooding: The finished floor levels of the proposed development is above the flood planning levels and the development will not materially increase flood risk off site. Traffic: Traffic generation associated with the operational phase of the proposed development is minimal. Accordingly, the proposed development will not adversely impact the operation of surrounding intersections or the local highway network. During construction, a traffic management plan will be implemented to minimise impacts to the road network. ESD: A range of ESD measures are incorporated within the site, which will enhance the overall sustainability of the proposed development. Noise: The proposed development will not result in any adverse noise and vibration impacts that cannot be appropriately managed. Following the implementation of the proposed mitigation measures, the childcare and co-living uses within Building 2 will also benefit from a high level of amenity.

Matter	Summary
	Waste: Waste generated by the construction and operation of the proposed development will be effectively managed through the implementation of a waste management plan. Utilities / services: The proposed development can be serviced by existing utilities.
Social impacts	The proposal will deliver predominantly positive social outcomes, supporting increased connectivity and accessibility, housing diversity and affordability, improvements to livelihoods and a safe and connected community.
Economic impacts	An economic impact assessment has been prepared by Urbis (Appendix KK), which demonstrates that the proposed WMQ development is anticipated to create 646 total annual peak full time employment jobs during construction and 645 ongoing peak operational jobs. Once fully operational, the WMQ development will contribute \$106.9m total ongoing gross value add to the NSW economy. The proposed retail floorspace will support the on-site population of the WMQ, including residents, students, and workers, while also benefiting from the foot traffic generated by commuters travelling through Waterloo metro station. Additionally, the tenancies will complement the existing provision within the surrounding area and reinforce the role of Waterloo as an emerging retail and services hub.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix II** to this EIS.

7.6. Suitability of the Site

Suitability of the site for a mixed-use development was primarily established as part of the concept DA. Overall, the detailed SSDA proposal for the central precinct is considered suitable for the site for the following reasons:

- The site comprises a highly accessible urban renewal site located in the City of Sydney LGA that has been identified for future high-density development within the statutory and strategic planning framework. The central precinct is located adjacent to the Waterloo metro station and close to a range of other transport infrastructure. The proposed development is consistent with the NSW Government and City of Sydney Council policies for the site and surrounding area including the Greater Sydney Region Plan, the East District Plan and local development controls.
- The proposed development takes advantage of the approved Sydney Metro project, with the airspace created as part of the Waterloo Quarter site to be developed for the purposes of Over Station Development. The proposed development will be successfully integrated with the Waterloo Station to allow optimal use of the public domain, increased pedestrian capacity and not impeding future station uses.
- The proposed development is permissible in the MU1 Mixed Use zone pursuant to the SLEP 2012 and delivers a new mixed use building to maximise the use of the future Metro infrastructure.
- Sufficient electrical, potable water, sewer and communications infrastructure are available (or can be made available) to service the proposed development.
- The central precinct is not affected by any environmental constraints that cannot be appropriately managed or mitigated. The design of the proposed development will minimise impacts to nearby public open space and local heritage items.

The proposal is considered suitable for the site as it delivers a world-class integrated public transport and mixed-use development, which aligns with relevant strategic and statutory planning policies and significant NSW Government investment in public infrastructure.

7.7. Public Interest

The detailed SSDA proposal is considered to be in the public interest for the following reasons:

- The project supports the concept of the '30 minute' city envisioned within State and Regional strategic planning policy, by locating a mixed use development proximate to public transport infrastructure.
- The proposal contributes to the vibrancy of Waterloo by providing a landmark development which provides complementary land uses to support the local area.
- The proposal provides 500 co-living accommodation units aiding in the diversity of residential tenure available within Sydney to suit the diverse and evolving needs of the population
- The proposed retail floorspace will support the needs of future residents and visitors to the site, including users of the Waterloo metro station
- The proposal has demonstrated high amenity and provision of good quality future co-living accommodation, which would provide an exceptional quality of life for future residents.
- The provision of community facilities, including a childcare centre will support the need of workers and residents within the WMQ site as well as the wider Waterloo community.
- New public domain areas are created by Building 2, providing a high-quality meeting and waiting area for users.
- The delivery of Church Square provides a meaningful amount of space for public appreciation and interaction with the Waterloo Congregational Church, which was never previously available.
- The design provides an activated podium interface with the public domain areas in and around the central precinct which affords increased natural surveillance to ensure minimised anti-social and criminal behaviour within the locality.
- The proposal includes high sustainability initiatives, including the provision of minimal car parking spaces, generous landscaping and various energy efficiency measures.

- The proposal would contribute to the delivery of 646 full time equivalent jobs during construction and 645 full time equivalent operational jobs across the overall WMQ site. Additional economic benefits would be provided by future residents using surrounding services following the completion of the development. The WMQ development will also contribute approximately \$233 million construction gross added value to the NSW economy and \$106.9 million annual ongoing gross added value to the NSW economy.

The proposal is in the public interest as it provides significant public benefits for the local and wider community by creating an exceptional experience for future site users and a landmark destination for public transport patrons.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

8. Conclusion

The proposed central precinct development is consistent with the strategic and statutory planning framework for the site, and is fully compliant with the land use and height requirements for the site as set out in the Sydney LEP 2012 and second amending concept DA. It delivers an integrated land use and public transport outcome by delivering 500 quality co-living units, childcare, community and retail floorspace directly adjacent to the new Waterloo metro station, consistent with the objectives of transit-oriented development.

The built form responds to feedback received through an extensive State Design Review Panel process and displays design excellence through the use of durable materials, sensitive integration with the surrounding context, and a cohesive architectural expression that reinforces Waterloo's character. The development is fully compatible within the Waterloo Metro Quarter and has been carefully designed to minimise adverse environmental impacts, with no unacceptable overshadowing of surrounding properties or public open spaces, including Alexandria Park, future Waterloo Estate park or Cope Street Plaza.

The proposal enhances the public domain through generous landscaped pedestrian connections, activated by ground floor retail, and high quality communal open spaces to provide residential amenity.

The development also incorporates best-practice sustainability measures, including ESD initiatives, energy efficiency and water-sensitive urban design.

The proposal will generate substantial public and economic benefits, including new housing supply in a highly accessible location, construction and operational jobs, and significant value uplift to the NSW economy.

On this basis, the proposal represents an orderly, sustainable and highly suitable use of the site in the public interest and is recommended for approval.

Disclaimer

This report is dated 6 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of WL Developer Pty Ltd (**Instructing Party**) for the purpose of Environmental Impact Statement (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Appendix

