



beam

Concept State Significant  
Development Application  
Environmental Impact Statement

Concept Proposal for Waterloo Estate (South)

Prepared for Stockland and NSW Land and Housing Corporation

---

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

---

<b>Authors:</b>	Ashleigh Ryan Director	aryan@beamplanning.com.au	
<b>Author:</b>	Eliza Hannah Senior Planner	ehannah@beamplanning.com.au	
<b>Author:</b>	Morgan Blamey Senior Planner	mblamey@beamplanning.com.au	

---

Reproduction of this document or any part thereof is not permitted without written permission of Beam Planning.

---



Beam Planning Pty Ltd | ABN 78 674 643 095 | [beamplanning.com.au](http://beamplanning.com.au)

---

# Contents

<b>EIS Declaration</b> .....	<b>8</b>
<b>Executive Summary</b> .....	<b>9</b>
<b>1.0 Introduction</b> .....	<b>11</b>
1.1 Overview.....	11
1.2 Applicant Details.....	12
1.3 Project Site .....	12
1.4 Proposed Development Summary.....	14
1.5 Project Objectives.....	15
<b>2.0 Project Background</b> .....	<b>16</b>
2.1 The Applicant .....	16
2.2 Planning Proposal PP-2021-3625 .....	16
2.3 Concurrent Planning Processes .....	16
<b>3.0 Site Analysis</b> .....	<b>20</b>
3.1 About the Site .....	20
3.2 Key Information about the Site .....	22
3.3 Surrounding Context .....	29
<b>4.0 Strategic Planning Context</b> .....	<b>34</b>
4.1 Strategic Planning Framework.....	34
4.2 Cumulative Impacts .....	40
4.3 Planning Agreements.....	40
4.4 Analysis of Alternatives.....	41
4.5 Project Justification .....	43
<b>5.0 The Proposed Rezoning</b> .....	<b>44</b>
5.1 Project Objectives and Intended Outcomes .....	44
<b>6.0 The Proposed Development</b> .....	<b>45</b>
6.1 Project Summary.....	45
6.2 Concept Proposal .....	46
6.3 Reference Scheme .....	66
6.4 Indicative Staging and Land Dedication .....	81
6.5 Precinct-wide Strategies .....	85
<b>7.0 Statutory Context</b> .....	<b>93</b>
7.1 Power to Grant Approval.....	93
7.2 Permissibility.....	93
7.3 Other Approvals .....	96
<b>8.0 Stakeholder Engagement</b> .....	<b>126</b>
8.1 Pre-Lodgement Engagement Undertaken .....	126
8.2 Preliminary Feedback and Responses .....	128
8.3 Future Engagement .....	133
<b>9.0 Assessment of Impacts</b> .....	<b>134</b>
9.1 Designing with Country .....	134
9.2 Design Quality and Design Excellence.....	135
9.3 Urban Design, Bulk and Scale.....	138
9.4 Environmental Amenity .....	141
9.5 Residential Amenity .....	154
9.6 Landscaping and Public Domain .....	162

9.7	Contamination and Remediation .....	167
9.8	Biodiversity and Tree Removal .....	168
9.9	Aboriginal Cultural Heritage .....	170
9.10	Environmental Heritage .....	173
9.11	Infrastructure Delivery and Staging .....	176
9.12	Water Management .....	177
9.13	Flood Risk .....	178
9.14	Traffic, Transport and Accessibility .....	181
9.15	Noise and Vibration .....	187
9.16	Aviation.....	190
9.17	Waste Management.....	191
9.18	Ecologically Sustainable Development .....	192
9.19	Social Impact.....	194
9.20	Accessibility .....	200
<b>10.0</b>	<b>Project Justification .....</b>	<b>201</b>
10.1	Project Design.....	201
10.2	Strategic Justification .....	201
10.3	Statutory Justification.....	202
10.4	Community Views.....	202
10.5	Likely Impacts .....	202
10.6	Principles of Ecologically Sustainable Development.....	204
10.7	Public Interest.....	204
10.8	Suitability of the Site .....	205
<b>11.0</b>	<b>Conclusion .....</b>	<b>206</b>

## Figures

<b>Figure 1</b>	Aerial view of the Waterloo Estate and Waterloo South Precinct Area (in red).....	13
<b>Figure 2</b>	Waterloo South Precinct Area and proposed new lot and block boundaries.....	13
<b>Figure 3</b>	Axonometric perspective of the reference scheme.....	14
<b>Figure 4</b>	Key concept development metrics.....	15
<b>Figure 5</b>	Comparison between 2022 Structure Plan (left) and proposed 2026 Structure Plan (right) .....	17
<b>Figure 6</b>	Location plan .....	20
<b>Figure 7</b>	Aerial view of the Waterloo Estate and the Waterloo Estate (South) precinct.....	21
<b>Figure 8</b>	Waterloo Estate (South) Project Area .....	22
<b>Figure 9</b>	Existing buildings in Waterloo South .....	23
<b>Figure 10</b>	Typical three storey walk-up in Waterloo South.....	24
<b>Figure 11</b>	Extract of road network.....	24
<b>Figure 12</b>	Public and active transport networks.....	25
<b>Figure 13</b>	Heritage Items and Heritage Conservation Areas Map (Waterloo South outlined in red) .....	27
<b>Figure 14</b>	Heritage items - I2077 former Waterloo pre-school (left) and - I2078 2-storey Victorian terrace houses (right). .....	27
<b>Figure 15</b>	Heritage item – 12085 - Duke of Wellington Hotel.....	27
<b>Figure 16</b>	Heritage item 12086 - Electricity Substation .....	27
<b>Figure 17</b>	Extent of AHIMS search .....	28
<b>Figure 18</b>	Existing mature trees.....	28
<b>Figure 19</b>	Turanga and Matavai public housing towers in Waterloo North .....	29
<b>Figure 20</b>	Redfern Station Entry.....	29
<b>Figure 21</b>	Terrace Houses.....	29
<b>Figure 22</b>	Green Square Town Centre.....	29
<b>Figure 23</b>	Waterloo Park.....	30
<b>Figure 24</b>	Our Lady of Mt Carmel Catholic Church.....	30
<b>Figure 25</b>	Alexandria Park .....	30
<b>Figure 26</b>	Waterloo Metro Station Entry.....	30
<b>Figure 27</b>	Photomontage of Waterloo Metro Quarter (SSD10439) viewed from Cope Street .....	33
<b>Figure 28</b>	Comparison of the building envelopes within the concept SSDAs .....	33
<b>Figure 29</b>	Axonometric perspective of the reference scheme.....	46
<b>Figure 30</b>	Project site area within the broader Waterloo estate precinct and Waterloo South block breakdown.....	48

<b>Figure 31</b>	Developable site area .....	49
<b>Figure 32</b>	Design principles .....	50
<b>Figure 33</b>	Designing with Country Principles .....	50
<b>Figure 34</b>	Indicative building typologies .....	51
<b>Figure 35</b>	Waterloo south maximum storey height .....	52
<b>Figure 36</b>	Proposed height distribution (viewed from northwest).....	52
<b>Figure 37</b>	Proposed consistent street wall .....	53
<b>Figure 38</b>	Maximum tower dimensions .....	53
<b>Figure 39</b>	Blocks 2 & 3 maximum storey height and envelope diagram .....	54
<b>Figure 40</b>	Block 4 maximum storey height and building envelope diagram.....	55
<b>Figure 41</b>	Blocks 5 & 6 maximum storey height and envelope diagrams .....	56
<b>Figure 42</b>	Block 7 maximum storey height and envelope diagrams .....	57
<b>Figure 43</b>	Block 8 maximum storey heights and building envelope diagrams .....	58
<b>Figure 44</b>	Block 9 maximum storey height and building envelope diagram.....	59
<b>Figure 45</b>	Block 10 maximum storey height and building envelope diagrams.....	60
<b>Figure 46</b>	Open Space Network .....	62
<b>Figure 47</b>	Movement Plan .....	64
<b>Figure 48</b>	Access and circulation .....	65
<b>Figure 49</b>	Indicative car park entrances.....	66
<b>Figure 50</b>	Block 2 Section.....	70
<b>Figure 51</b>	Block 3 - Section 2 (3AB1) and Section 3 (3BB1) .....	70
<b>Figure 52</b>	Block 4 Sections (4BB1 left, 4CB1 centre, 4CB2 right).....	71
<b>Figure 53</b>	Block 5 Section (5AB2 left & 5BB2 right).....	72
<b>Figure 54</b>	Block 6 Sections (6AB1 left & 6AB2 right) .....	73
<b>Figure 55</b>	Block 7 Section (7BB1 left & 7AB1 right).....	74
<b>Figure 56</b>	Block 8 Ground Plane .....	75
<b>Figure 57</b>	Block 8 Sections (8AB3 left, 8DD1 centre, 8AB1 right) .....	76
<b>Figure 58</b>	Block 8 Section (8CB1 left, 8DB1 centre, 8AB2 right) .....	76
<b>Figure 59</b>	Block 8 Sections (8CB1 left & 8BB1 right).....	77
<b>Figure 60</b>	Block 9 Section (9BB1 left & 9AB1 right).....	78
<b>Figure 61</b>	Block 10 Section (10AB1 left & 10BB1 right) .....	79
<b>Figure 62</b>	Access and loading arrangements .....	80
<b>Figure 63</b>	Basement extent plans .....	80
<b>Figure 64</b>	Indicative Staging Plan.....	81
<b>Figure 65</b>	Land Dedication Plan .....	84
<b>Figure 66</b>	Design Excellence Framework .....	87
<b>Figure 67</b>	Tree Retention Plan.....	90
<b>Figure 68</b>	Zoning of the site.....	103
<b>Figure 69</b>	Proposed maximum building heights .....	120
<b>Figure 70</b>	Proposed maximum FSR map .....	121
<b>Figure 71</b>	Proposed LEP Active Street Frontage Map.....	123
<b>Figure 72</b>	Proposed concept SSDA active frontage locations .....	124
<b>Figure 73</b>	Indicative active uses proposed in reference scheme design .....	124
<b>Figure 74</b>	Setback diagram.....	140
<b>Figure 75</b>	Public domain solar analysis.....	143
<b>Figure 76</b>	Solar analysis to surrounding existing dwellings .....	144
<b>Figure 77</b>	Comparison of Sky View Index from the public domain .....	145
<b>Figure 78</b>	Building separation.....	155
<b>Figure 79</b>	Extract of building 2DB1 solar access.....	158
<b>Figure 80</b>	Extract of Block 4 solar access.....	158
<b>Figure 81</b>	Extract of Block 8 solar access.....	159
<b>Figure 82</b>	Extracts of Block 9 solar access .....	160
<b>Figure 83</b>	Extracts of solar access Block 10 solar access .....	160
<b>Figure 84</b>	Public art precedent images .....	165
<b>Figure 85</b>	Public art precedent images .....	166
<b>Figure 86</b>	AHIMS search area.....	171
<b>Figure 87</b>	Location of PAD and shell fragments .....	172
<b>Figure 88</b>	Heritage items within 250m of the site .....	174
<b>Figure 89</b>	Flood behaviours diagram .....	179
<b>Figure 90</b>	Proposed street network.....	182

<b>Figure 91</b> Comparison of the vehicular trip generation under PP-2021-3625 and the concept SSDA .....	183
<b>Figure 92</b> Cooper Street Section (2022 Design Guide shown on the left, updated design guide shown on the right).....	185
<b>Figure 93</b> Photomontage of George Street .....	185
<b>Figure 94</b> Noise monitoring locations and surrounding sensitive receivers Source: Noise and Vibration Impact Assessment prepared by E-Lab.....	188

## Tables

<b>Table 1</b> Applicant details.....	12
<b>Table 2</b> Legal Description of Waterloo South .....	20
<b>Table 3</b> Site characteristics .....	22
<b>Table 4</b> Surrounding Context .....	29
<b>Table 5</b> Developments in the vicinity of the site .....	30
<b>Table 6</b> Summary of strategic context.....	34
<b>Table 7</b> Summary of key development metrics.....	46
<b>Table 8</b> Indicative residential unit mix and yield.....	67
<b>Table 9</b> Indicative non-residential land use distribution.....	68
<b>Table 10</b> Indicative Development Staging and VPA commitments .....	81
<b>Table 11</b> Timing of VPA Delivery.....	83
<b>Table 12</b> Power to grant approval.....	93
<b>Table 13</b> Permissibility of the proposed development.....	93
<b>Table 14</b> Other approvals.....	96
<b>Table 15</b> Pre-conditions for the consent authority .....	97
<b>Table 16</b> Summary of mandatory matters for consideration.....	98
<b>Table 17</b> Assessment against Sydney LEP 2012 .....	102
<b>Table 18</b> Implications of Draft Sydney LEP 2012 on the concept SSDA.....	114
<b>Table 19</b> Proposed Amendments to Sydney LEP 2012.....	118
<b>Table 20</b> Proposed LEP maximum building height.....	120
<b>Table 21</b> Proposed maximum GFA per block .....	121
<b>Table 22</b> Consistency between the LEP Active Frontage map and proposed active frontage locations .....	122
<b>Table 23</b> Summary of engagement methodology .....	126
<b>Table 24</b> The Department and GANSW Consultation Outcomes .....	128
<b>Table 25</b> Agency consultation outcomes .....	129
<b>Table 26</b> Summary of community engagement feedback.....	132
<b>Table 27</b> Assessment against design excellence considerations .....	135
<b>Table 28</b> Summary of visual impacts.....	147
<b>Table 29</b> Solar access performance of proposed development in mid-winter .....	156
<b>Table 30</b> Natural cross ventilation achieved across first nine levels of reference scheme .....	161
<b>Table 31</b> Flood Planning Levels .....	180
<b>Table 32</b> Rating Background Noise Levels .....	188
<b>Table 33</b> Long-term traffic noise monitoring results.....	189
<b>Table 34</b> Assessment of the proposal against relevant social categories.....	195
<b>Table 35</b> Assessment against ecologically sustainable development principles .....	204

## Appendices


Appendix	Prepared by
A. SEARs Compliance Table	<i>Beam Planning</i>
B. Statutory Compliance Table	<i>Beam Planning</i>
C. Mitigation and Management Measures	<i>Beam Planning</i>
D. Community Consultation Table	<i>Beam Planning</i>
E. Assessment against the updated Waterloo South Design Guide	<i>Beam Planning</i>
F. Urban Design Report	<i>SJB</i>

Appendix	Prepared by
G. Survey Plan	RPS
H. Draft Subdivision Plans	RPS
I. Designing with Country Report	Nguluway DesignInc
J. Public Domain and Landscape Report	Aspect Studios
K. Crime Prevention Through Environmental Design (CPTED) Assessment	Urbis
L. Preliminary Public Art Plan	UAP
M. Engagement Outcomes Report	L10 Collective
N. Design Excellence Strategy	Beam Planning
O. Environmental Wind Report	SLR
P. Visual Impact Assessment	Urbis
Q. Arboricultural Impact Assessment	Tree Management Strategies
R. Biodiversity Development Assessment Report Waiver	Narla Environmental & Department of Planning, Housing and Environment
S. DSI Data Gap Investigation (including Auditor review of O-RAP)	JBS&G & Senversa
T. Remediation Action Plan	JBS&G
U. Stormwater Management Plan	WSce
V. Historical Archaeological Assessment	Artefact
W. Archaeological Technical Report	Artefact
X. Statement of Heritage Impact	Artefact
Y. Aboriginal Cultural Heritage Assessment Report	Artefact
Z. Infrastructure Delivery and Staging Plan	WSce
AA. Flood Impact and Risk Assessment	GRC Hydro
BB. Preliminary Noise and Vibration Impact Assessment	E-LAB Consulting
CC. Transport Impact Assessment	PTC
DD. Waste Management Plan	WSP
EE. Social Impact Assessment and Social Impact Management Plan	Urbis
FF. ESD Report	WSP
GG. Aviation Impact Assessment	ARUP
HH. Accessibility Assessment	Jensen Hughes
II. EDC Summary Letter	Altus Group
JJ. Concept Envelope Plans	SJB
KK. Waterloo South Rezoning Proposal	Beam Planning

**Under Separate Cover:**

EDC Report prepared by Altus Group  
Landowners' Consent

# EIS Declaration

Project Details	
Project name	Waterloo Estate (South) Concept
Application number	SSD-93222706
Address of the land in respect of which the development application is made	6 John Street, 97-109 Cooper Street, 209-219, 229-231 & 247-251 Cope Street, 238-246, 248-254, 331-337 & 339-341 George Street, 232 & 250 Pitt Street, & 74-76 Wellington Street, Waterloo within the City of Sydney LGA
Applicant Details	
Applicant name	NSW Land and Housing Corporation
Applicant address	Level 6, 6 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
ABN	24 960 729 253
Details of person(s) by whom this EIS was prepared	
Name	Ashleigh Ryan Eliza Hannah
Organisation	Beam Planning Pty Ltd Beam Planning Pty Ltd
Address	Level 7.01, 60 Carrington Street, Sydney Level 7.01, 60 Carrington Street, Sydney
Professional qualifications	BPlan (Hons 1), UNSW; PIA REAP BPlan, Macquarie University
Declaration by registered environmental assessment practitioner	
Name	Ashleigh Ryan
Registration number	59156
Organisation registered with	Planning Institute of Australia
Declaration	<p>The undersigned declares that this EIS:</p> <ul style="list-style-type: none"> <li>• Has been prepared in accordance with the <i>Environmental Planning and Assessment Regulation 2021</i>;</li> <li>• Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;</li> <li>• Does not contain information that is false or misleading;</li> <li>• Addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;</li> <li>• Identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;</li> <li>• Has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement;</li> <li>• 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;</li> <li>• Contains a consolidated description of the project in a single chapter of the EIS;</li> <li>• Contains an accurate summary of the findings of any community engagement; and</li> <li>• Contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.</li> </ul>
Signature	
Date	16 April 2026

# Executive Summary

This Environmental Impact Statement (EIS) has been prepared by Beam Planning for Stockland on behalf of NSW Land and Housing Corporation (the applicant) in support of a concept State Significant Development Application (concept SSDA) made to the Department of Planning, Housing and Infrastructure for the redevelopment of Waterloo Estate (South), known as 'Waterloo South' (the site). This concept SSDA seeks consent for the land uses, building envelopes, indicative development yields and distribution of development, public domain outcomes, and infrastructure delivery parameters which will inform the future detailed applications undertaken for the site.

This Environmental Impact Statement responds to the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Housing and Infrastructure. It provides the context of the site, the consistency of the proposal with strategic plans and planning guidelines, the applicable statutory context, the community/ stakeholder engagement undertaken for the project, and the anticipated environmental impacts of the proposed development, with mitigation measures to reduce any potential adverse impacts.

## Where is the site?

The site is known as Waterloo Estate (South) or 'Waterloo South' and comprises the land owned by the NSW Land and Housing Corporation and surrounding public roads located at 6 John Street, 97-109 Cooper Street, 209-219, 229-231 & 247-251 Cope Street, 238-246, 248-254, 331-337 & 339-341 George Street, 232 & 250 Pitt Street and 74-76 Wellington Street, Waterloo.



## What is this SSDA for?

This concept SSDA seeks consent for the land uses, building envelopes, indicative development yields and distribution of development, public domain outcomes, and infrastructure delivery parameters which will inform the future detailed applications undertaken for the site. The concept SSDA does not seek consent for any physical works on the site, but it establishes the key planning, design and development principles and considerations that will inform future and separate applications that will seek consent for the construction of new development on the site. Once the concept SSDA is determined, future applications will be assessed against their consistency with the concept SSDA.

## Why is it being lodged?

The application is being lodged to facilitate the long-term renewal of an ageing social housing estate and to deliver a mixed-tenure, mixed-use precinct that responds to critical housing supply needs in inner Sydney. The proposal will replace housing stock that is approaching the end of its functional life with contemporary, high-quality dwellings supported by community facilities, open space, services and infrastructure.

The proposed concept development contributes to State and national housing objectives by delivering approximately 3,300 new dwellings, of which a minimum 30 per cent will be social housing, approximately 20 per cent will be affordable housing, and a maximum 50 per cent will be market housing (measured as a percentage of the total residential gross floor area) in a highly accessible location close to public transport, employment and services. The redevelopment will improve liveability, safety, accessibility and sustainability outcomes for existing and future residents while supporting broader public interest outcomes through increased housing supply, economic activity and enhanced public domain.

<p><b>What is the development's strategic context?</b></p>	<p>The site is located within inner Sydney in close proximity to Waterloo metro station, major employment centres, education and health facilities, and established transport, walking and cycling networks.</p> <p>Strategic planning at Commonwealth, State and local levels identifies the need to increase well-located housing supply, deliver diverse and affordable housing, and support urban renewal of government-owned land in accessible precincts.</p> <p>The proposal aligns with these directions by delivering an integrated and highly accessible neighbourhood that combines housing, community infrastructure, services, employment opportunities and high-quality public domain.</p>
<p><b>Does it comply with the relevant planning controls?</b></p>	<p>The proposed development is permissible with consent under the applicable statutory framework, including the <i>Sydney Local Environmental Plan 2012</i> (as proposed to be amended through the concurrent rezoning) and relevant State environmental planning policies. The proposed development aligns with the development standards concurrently sought to be updated for the site within the State Assessed Rezoning Application for Waterloo South.</p> <p>The concept SSDA establishes a planning framework consistent with these controls and demonstrates that future detailed development can achieve compliance with applicable built form, environmental and infrastructure requirements.</p>
<p><b>What are the key findings of the preliminary stakeholder engagement?</b></p>	<p>Extensive consultation has been undertaken with government agencies, Aboriginal stakeholders, existing tenants, the local community, infrastructure providers and other key stakeholders.</p> <p>Feedback has informed the evolution of the proposal, particularly in relation to; housing tenure mix and tenure-blind outcomes, built form impacts and residential amenity, connectivity, walkability and reduced vehicle dominance, open space, community facilities and cultural recognition and infrastructure, transport and service provision.</p> <p>These concerns have been considered and addressed throughout the design of the project, as detailed in the Engagement Outcomes Report (<b>Appendix M</b>). Refer to <b>Section 8.0</b> for more detail on stakeholder engagement.</p>
<p><b>What are the key impacts and how will they be managed?</b></p>	<p>A detailed assessment of the project has been undertaken in accordance with the SEARs. The assessment has found that where there are potential impacts, they can be appropriately mitigated and managed to ensure a suitable and appropriate outcome for the site. A summary of the relevant environmental assessment is provided in <b>Section 9.0</b> of this report.</p>
<p><b>Who is responsible for approving it?</b></p>	<p>The proposed concept development is declared as SSD as per Section 26, Schedule 1 of <i>State Environmental Planning Policy Planning Systems 2021</i> (Planning Systems SEPP) as the project includes housing development carried out by or on behalf of the NSW Land and Housing Corporation, with an estimated development cost (EDC) of more than \$30 million. Pursuant to Section 4.5(a) of the EP&amp;A Act, the Minister for Planning and Public Spaces, or their delegate will be the consent authority for the application.</p>
<p><b>Why should it be approved?</b></p>	<p>The proposed development should be approved for the following reasons:</p> <ul style="list-style-type: none"> <li>• Is strategically justified and consistent with Commonwealth, State and local planning objectives</li> <li>• Facilitates renewal of ageing social housing with high-quality contemporary homes</li> <li>• Delivers substantial social and affordable housing within a well-located inner-city precinct</li> <li>• Provides community facilities, services, employment opportunities and high-quality public domain</li> <li>• Supports sustainable transport, walkability and urban integration</li> <li>• Will not result in unacceptable environmental impacts that cannot be appropriately managed through mitigation measures</li> <li>• Is suitable for the site and delivers clear public benefit through housing supply, social inclusion and long-term urban renewal</li> </ul> <p>A detailed justification of the proposed development is provided within <b>Section 9.0</b>.</p>

# 1.0 Introduction

## 1.1 Overview

This Environmental Impact Statement (EIS) has been prepared by Beam Planning for Stockland on behalf of NSW Land and Housing Corporation (the Applicant) to assess the economic, environmental, and social impacts of a concept State Significant Development Application (the concept SSDA) for the renewal of Waterloo Estate (South), known as 'Waterloo South' (the site).

The concept SSDA establishes the planning and design framework to guide the long-term, staged redevelopment of the site which is anticipated to occur progressively over a period of approximately 10 to 15 years. It defines building envelopes, indicative distribution of land uses and development yields, public domain outcomes, and infrastructure delivery parameters that will inform future detailed development applications.

The concept SSDA establishes an overarching framework for the delivery of a high-density, mixed-use precinct that responds to its inner-city context and supports greater housing diversity, social outcomes, and place-based amenity across the site. The concept SSDA facilitates the delivery of approximately 3,300 new dwellings, of which a minimum 30 per cent will be social housing, approximately 20 per cent will be affordable housing, and a maximum 50 per cent will be market housing (measured as a percentage of the total residential gross floor area). The precinct will also accommodate a range of complementary uses, including commercial uses, and publicly accessible open spaces, integrated with essential services.

The concept SSDA builds upon previous strategic planning work and studies, and consultation with the existing community and other stakeholders, to establish a contemporary planning and design framework that is informed by feedback, detailed feasibility testing, design development, and delivery planning.

Planning for the renewal of the Waterloo South Precinct Area has evolved over several years. A planning proposal was prepared by NSW Land and Housing Corporation (NSW LAHC) in 2020 and amended in 2022 following feedback from the community, the City of Sydney, and the NSW Department of Planning, Housing and Infrastructure (the Department). That process introduced new land use zoning, amended height and floor space ratio development standards, site-specific planning provisions, and the Waterloo Estate (South): Design Guide 2022 (2022 Design Guide) to support the future delivery of the renewal project. A tripartite Voluntary Planning Agreement (VPA) securing key public benefits to be delivered within the renewal project was also executed in February 2023 between the Department, the City of Sydney and NSW LAHC.

Following a competitive tender process, in April 2025 the NSW Government selected Stockland and their partners Link Wentworth, City West Housing, and Birribee Housing as the consortium that will deliver the renewal of Waterloo South. In reviewing the planning controls that currently apply to the site, Stockland and Homes NSW have identified inconsistencies between the 2020-2022 planning documents that apply to the site, and have further identified additional opportunities to improve the amenity of the precinct and to deliver upon the NSW Government's commitment to deliver 50 per cent of the residential floor space as social and affordable housing.

As such, concurrent with the lodgement of the concept SSDA, the Applicant proposes amendments to the *Sydney Local Environmental Plan 2012* (Sydney LEP 2012) and the 2022 Design Guide within a State-Assessment Rezoning Proposal (Rezoning Proposal). Together, these processes are intended to improve delivery certainty, reduce reliance on site-specific variations at later stages, and ensure the planning framework effectively supports the NSW Government's commitment to delivering social and affordable housing while maintaining high-quality residential amenity and public domain outcomes.

The concept SSDA has been prepared to align with these proposed amendments to the Sydney LEP 2012 and 2022 Design Guide and will be assessed by the Department concurrently with the Rezoning Proposal. This EIS however addresses how the concept development relates to both the existing and proposed planning provisions that apply to the site.

The proposed concept development is declared as SSD as per Section 26, Schedule 1 of *State Environmental Planning Policy Planning Systems 2021* as the project includes housing development carried out by or on behalf of the NSW Land and Housing Corporation, with an estimated development cost (EDC) of more than \$30 million.

This EIS has been prepared in accordance with the requirements under Division 5 of the *Environmental Planning & Assessment Regulation 2021* (EP&A Regs) and having regard to the SSD Guidelines and Industry-Specific SEARs. It is submitted to the Department pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This EIS is based on the Architectural Drawings prepared by SJB (see **Appendix F**) and other technical studies appended to this report (see Appendices List).

## 1.2 Applicant Details

NSW Land and Housing Corporation is responsible for delivering social and affordable housing, addressing homelessness, and managing the construction, maintenance and repair of public housing across NSW. In this report or supporting documents a reference to “Homes NSW” or “the Applicant” shall also be taken to mean “New South Wales Land and Housing Corporation (NSW LAHC)” who is the registered owner of 93 per cent of land within the Waterloo South Precinct Area.

Following a competitive tender process, in April 2025 the NSW Government selected Stockland and their partners Link Wentworth, City West Housing, and Birribee Housing as the Development Partner that will deliver the renewal of NSW LAHC owned land within the Waterloo South site.

The concept SSDA only applies to the land within the Waterloo South Precinct Area that is owned by NSW LAHC and other publicly owned lands such as roads. The concept SSDA does not apply to any privately owned land within the precinct area as described in **Section 1.3** below.

**Table 1** Applicant details

Applicant Details	
<b>Applicant name</b>	NSW Land and Housing Corporation
<b>Applicant address</b>	Level 6, 6 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
<b>ABN</b>	24 960 729 253

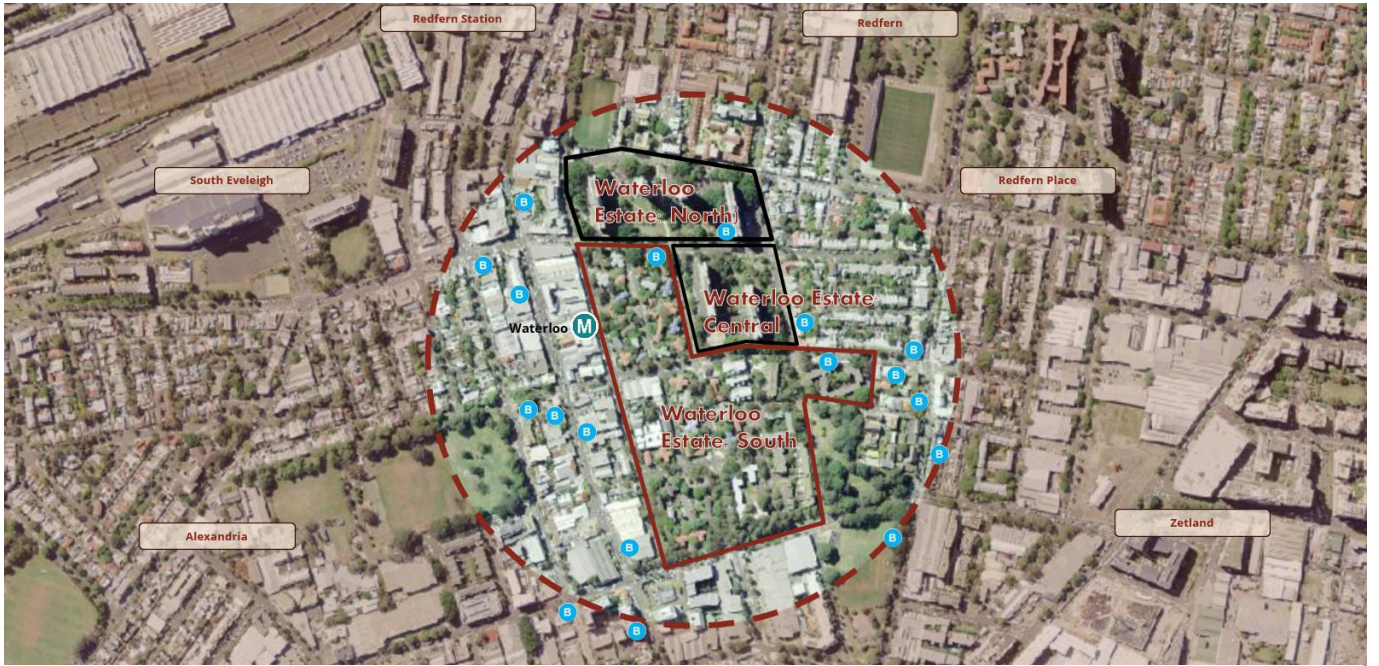
## 1.3 Project Site

The site is located on the traditional land of the Gadigal people of the Eora Nation, within what is now the suburb of Waterloo. The suburb of Waterloo is located with the City of Sydney Local Government Area (LGA) and is located 3km south of Sydney CBD. The site is part of the broader Waterloo Estate, which comprises the northern, central, and southern precincts and accommodates a significant community residing in social housing.

Waterloo Estate (South) (from here out referred to as ‘Waterloo South’) extends across 10 street blocks within the inner-city suburb of Waterloo (refer to **Figure 1**). Waterloo South is generally bound by Cope, Raglan, George, Wellington, Gibson, Kellick, Pitt and McEvoy streets.

The Waterloo South Precinct Area is predominantly owned by NSW LAHC. The NSW LAHC owned sites are currently used almost exclusively for the provision of social housing, with ancillary offices and community facilities. Adjacent roads and public realm lands owned by City of Sydney Council and Transport for NSW. Waterloo South currently contains a total of 750 social housing dwellings and 120 private dwellings. Consistent with the prior planning approach, the concept SSDA and this EIS does not apply to the privately owned properties within the Waterloo South Precinct Area, and works are constrained to the remainder of the precinct owned by Homes NSW and other publicly owned lands as depicted in **Figure 2**.

The broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Botany Road Precinct, Waterloo Metro Quarter and Over Station Development (OSD) all contributing to the changing character of the area. These broader renewal projects are supported by proximity to a range of public transport services, including Redfern station, Green Square station, and Waterloo metro station, all of which are within walking distance of Waterloo South.

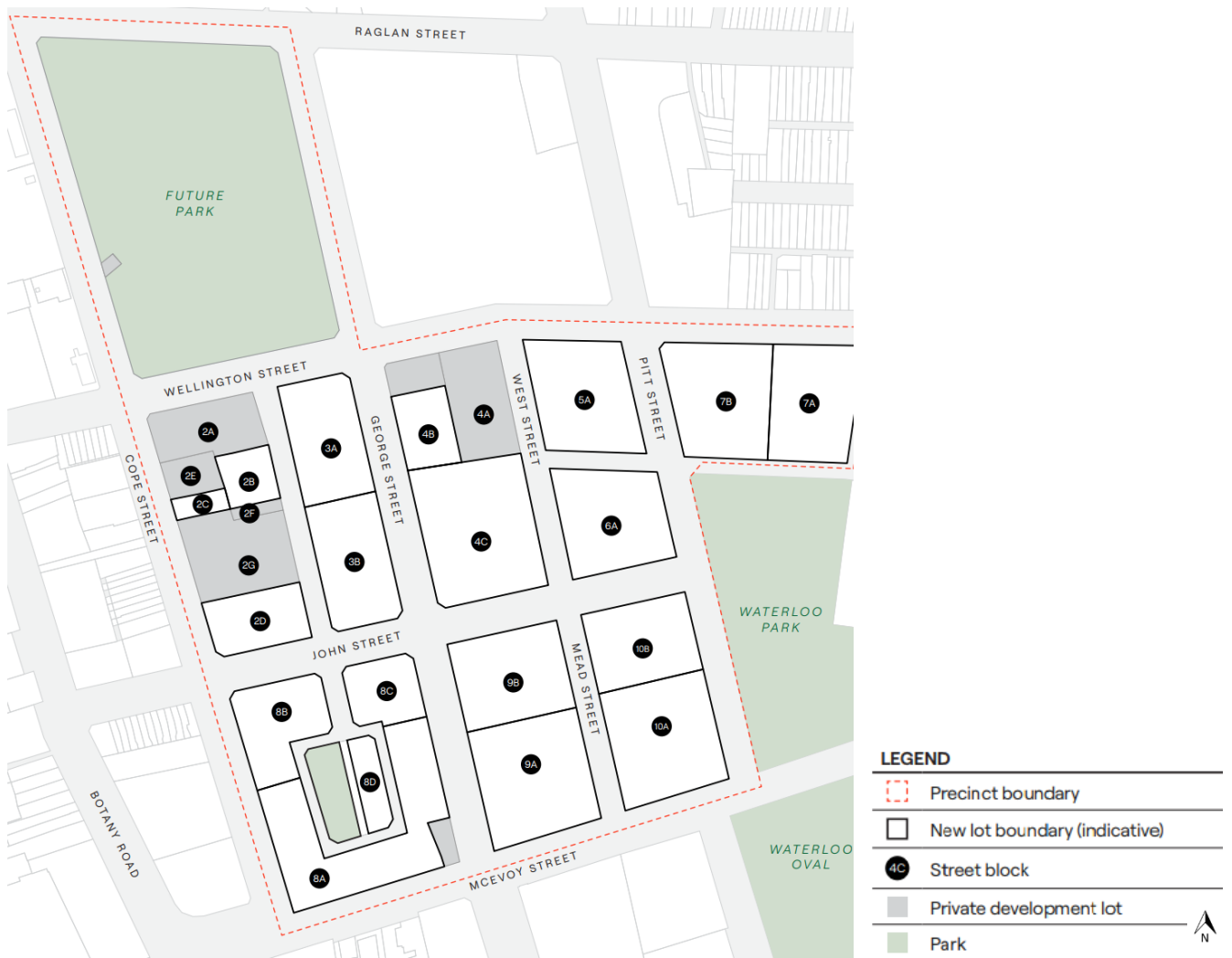


Waterloo South Precinct Area

NOT TO SCALE

**Figure 1** Aerial view of the Waterloo Estate and Waterloo South Precinct Area (in red)

Source: Six Maps, modified by Beam Planning



**Figure 2** Waterloo South Precinct Area and proposed new lot and block boundaries

Source: Revised Design Guide (Waterloo South)

## 1.4 Proposed Development Summary

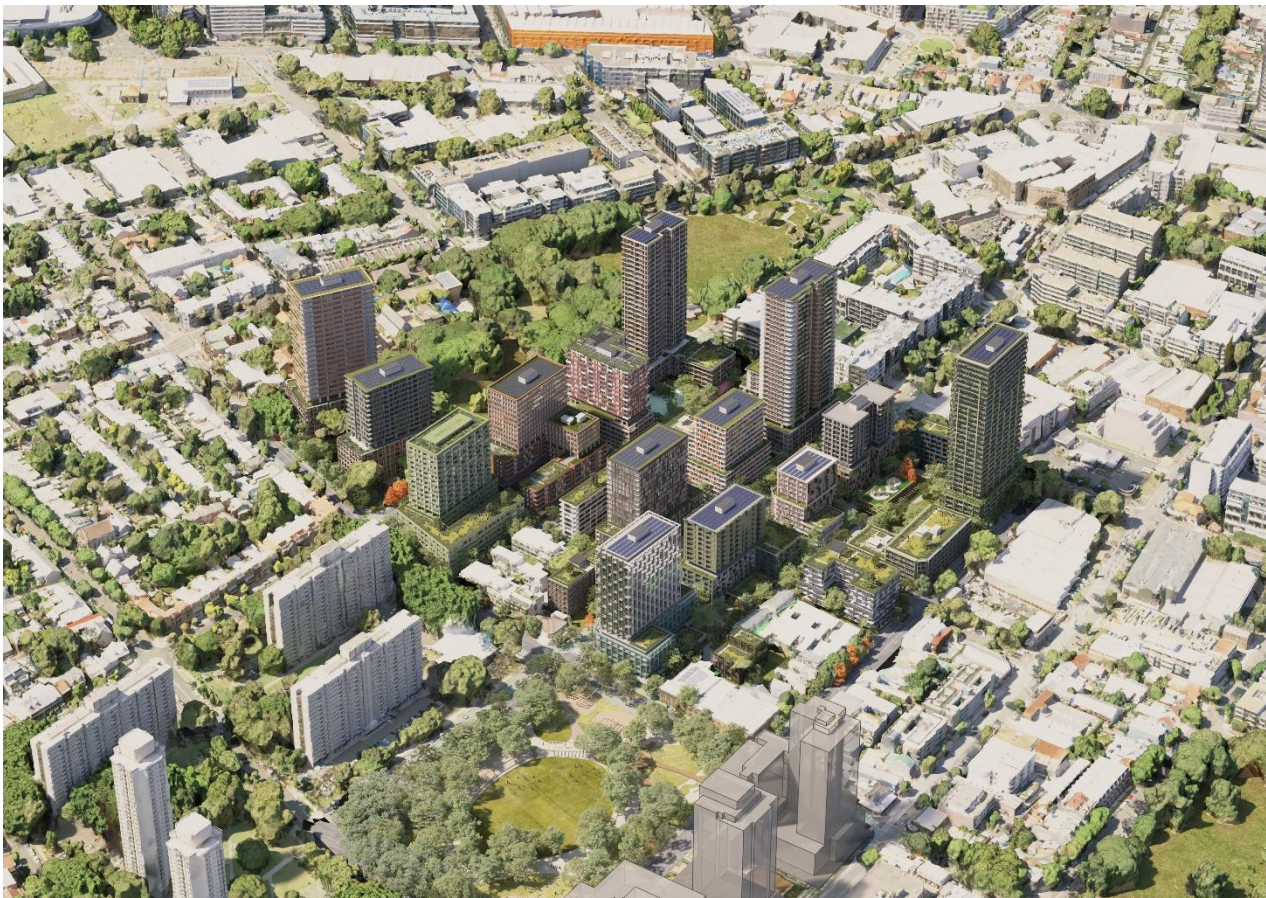
This EIS has been prepared to support a concept SSDA which seeks consent for the land uses, building envelopes, indicative development yields and distribution of development, public domain outcomes, and infrastructure delivery parameters which will inform the future detailed applications undertaken for the site.

More specifically, the concept SSDA seeks development consent for the following:

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

The concept SSDA does not seek consent for any physical works on the site, but it establishes the key planning, design and development principles and considerations that will inform future and separate applications that will seek consent for the construction of new development on the site. Once the concept SSDA is determined, future applications will be assessed against their consistency with the concept SSDA.

The building envelopes and development sought within the concept SSDA have been informed by the preparation of a 'reference scheme' by SJB in collaboration with the Indigenous Executive Architect Nguluway DesignInc (**Appendix F**) which demonstrates how the precinct may be developed in the future in accordance with the maximum building envelopes and parameters proposed in the concept SSDA. An illustration of the future development facilitated by the proposed concept SSDA is provided at **Figure 3**.



**Figure 3** Axonometric perspective of the reference scheme

Source: Design Report prepared by SJB

## 1.5 Project Objectives

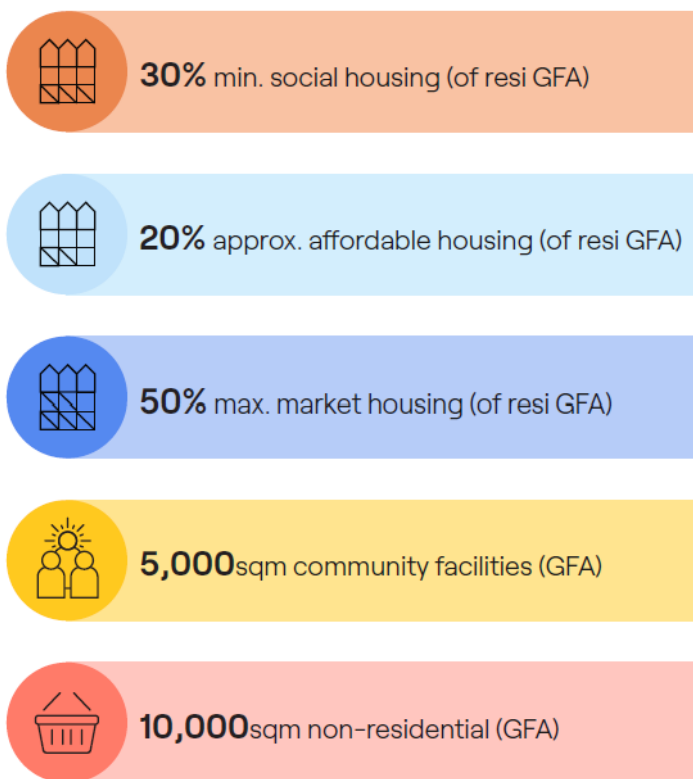
The vision for the site is to create a unique and vibrant mixed-tenure housing precinct that supports the needs of the community and delivers much needed housing in response to National and State Government priorities. The Vision is:

**To create a new and unique urban village on the Project Land (Gadigal Land) which:**

- **delivers new homes, community places and green spaces with diverse housing choice and amenity;**
- **prioritises the health and wellbeing of residents;**
- **and offers an authentic sense of place and mixed and more sustainable local and mixed communities.**

The proposed redevelopment seeks to respond to this Vision by creating a unique and vibrant neighbourhood that can deliver significant social benefits to residents, visitors, and workers in the Waterloo area and broader City of Sydney LGA. The co-location of community uses with housing and employment will ensure the redevelopment is an integrated, accessible and connected precinct that supports the social needs of community.

To achieve the project objectives, the concept SSDA will seek to achieve the key development metrics as summarised in **Figure 4**.



**Figure 4** Key concept development metrics

Source: Design Report prepared by SJB

## 2.0 Project Background

### 2.1 The Applicant

NSW LAHC is responsible for delivering social and affordable housing, addressing homelessness, and managing the construction, maintenance and repair of public housing across NSW. As part of the NSW Department of Communities and Justice, NSW LAHC owns the majority of land within the Waterloo South precinct.

Following a competitive tender process, in April 2025 the NSW Government selected Stockland and their partners Link Wentworth, City West Housing, and Birribee Housing as the Development Partner that will deliver the renewal of the Homes NSW owned land within the Waterloo South site.

As such the concept SSDA is submitted to the Department on behalf of Stockland (as the consortium lead) and NSW LAHC. To reiterate, the concept SSDA and this EIS does not apply to the privately owned properties within the Waterloo South precinct. The concept SSDA does however impact City of Sydney owned local assets including local roads through the site and McEvoy Street which is a classified road.

### 2.2 Planning Proposal PP-2021-3625

In May 2020, the NSW Land and Housing Corporation lodged a request with the City of Sydney to amend the planning controls for Waterloo South. This followed the Minister for Planning and Public Spaces' announcement in November 2019 that designated the City of Sydney as the plan-making authority for the precinct.

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

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

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

In February 2023, a tripartite VPA was executed between the Department, the City of Sydney, and NSW LAHC in relation to the future development of Waterloo South. On 08 May 2025 Stockland was added as an Incoming Party to the executed VPA by way of a Deed of Accession, meaning that Stockland will carry out remaining obligations of the VPA as outlined in the Deed of Accession.

### 2.3 Concurrent Planning Processes

The redevelopment of Waterloo South is a long-term project that requires a staged approach. As the state's largest social housing area, Stockland and Homes NSW are proposing to stage the delivery of the precinct to reduce disruption to existing residents on the site, whilst endeavouring to expedite the delivery of new homes in accordance with the objectives of the National Housing Accord.

To ensure that the development proceeds in a timely and cost-effective manner, the redevelopment will occur via several planning pathways. Relevant to this concept SSDA are two concurrent planning processes described below.

### 2.3.1 State Assessed Rezoning Proposal

Since the finalisation of the 2020-2022 planning proposal, Stockland, in collaboration with Homes NSW, has undertaken detailed design development, feasibility testing and delivery planning for the precinct.

These investigations were undertaken to ensure the project can deliver upon the NSW Government commitment for the mix of social and affordable housing across the site, accommodate the residential typologies proposed to be managed by the Community Housing Providers (CHPs), and to look for opportunities to improve amenity and the overall quality of the precinct.

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

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

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

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



**Figure 5** Comparison between 2022 Structure Plan (left) and proposed 2026 Structure Plan (right)

Source: Design Report prepared by SJB

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

In line with the NSW Government's 'Program Guideline – Prioritising rezonings that deliver social and affordable housing' (May 2024), the Department's State Significant Rezoning Evaluation Panel determined on 10 June 2025 that the Waterloo South Rezoning Proposal meets the eligibility criteria for the State Significant Rezoning Program as a State-assessed Rezoning Proposal. The Panel subsequently supported this application to proceed under the state-assessed pathway. As such, a Rezoning Proposal is submitted concurrently with the concept SSDA to the Department for assessment, as is outlined in **Section 5.0**. The Rezoning Proposal has been informed by pre-lodgement consultation with the City of Sydney, State Government Agencies, members of the community, and other relevant stakeholders. This Rezoning Proposal will facilitate the determination of the concept SSDA and guide the future staged development of Waterloo South.

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

### 2.3.2 Review of Environmental Factors

A Review of Environmental Factors (REF) has been prepared by Stockland on behalf of Homes NSW, in accordance with Division 5.1 Part 5 of the EP&A Act 1979 for Blocks 8 and 9 of the Waterloo South development, also referred to as 'Stage 1' of the development. The REF was determined for approval on the 26 February 2026. The works proposed under the REF include demolition and site preparation to facilitate future development.

The scope of works proposed under the Stage 1 REF includes the following within the boundaries of Block 8 of the Waterloo South precinct:

- Demolition of seven existing 2- and 3-storey buildings.
- Demolition of associated and ancillary structures such as pavilions and landscaping structures.
- Removal of trees.
- Services infrastructure works associated with decommissioning the buildings.

The scope of works proposed under the Stage 1 REF includes the following within the boundaries of Block 9 of the Waterloo South precinct:

- Demolition of three existing 3-storey buildings.
- Demolition of associated and ancillary structures such as pavilions and structures.
- Removal of trees.
- Services infrastructure works associated with decommissioning the buildings.
- Removal of contaminated or hazardous materials.

Tree removal proposed under the Stage 1 REF is limited to trees located within the immediate proximity of existing buildings proposed to be demolished and does not include any street trees, or trees located outside of the boundaries of Blocks 8 and 9 of the Waterloo South Precinct Area.

It is proposed that the above works are completed as development permitted without consent as per Division 6, Part 2, of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP). The scope of works for the Stage 1 REF is a distinct and stand-alone package of works that are not related to any works proposed as SSD as per clause 4.38(4) of the EP&A Act 1979. Subsequent REFs may be prepared for the demolition of buildings and structures in later stages if deemed appropriate.

### 2.3.3 Other Works

The renewal of Waterloo South is a long-term project, to be completed across multiple stages. There may be times throughout the renewal program where buildings or land may be vacated before detailed development consent is granted or works have commenced on the next stage of the project. In these circumstances, the Applicant may consider appropriate 'meanwhile uses' to ensure that Government owned land is efficiently utilised to the benefit of the community throughout the construction program.

The extent and type of potential temporary or 'meanwhile uses' are varied, and may include for e.g. crisis accommodation, pop up markets, gardens, recreation areas, creative spaces / pop up art galleries, business premises, community meeting areas, retail premises, and/or health facilities. The timeframes for these 'meanwhile uses' are also varied from single day events to minimum 6-month lease terms.


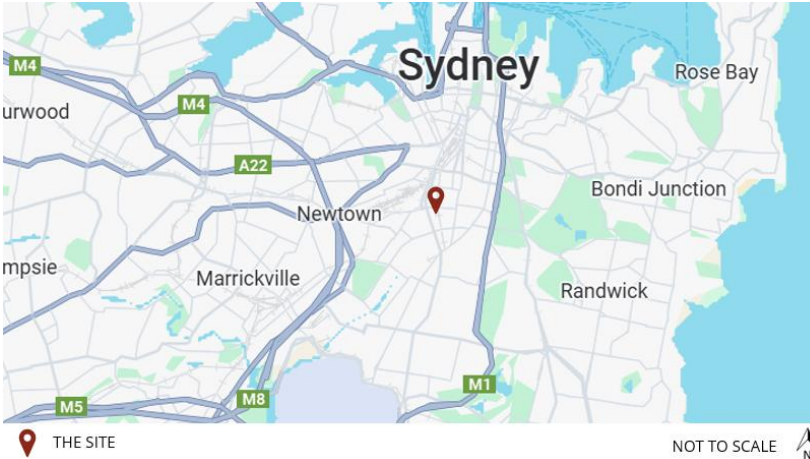



Development consent is not sought for any 'meanwhile uses' within this Concept SSDA, and separate approvals (where required) will be sought should 'meanwhile uses' be pursued in the future. Such 'meanwhile uses' are entirely separate and not related to the works proposed within the Concept SSDA scope and therefore will not be considered part of a single development that is categorised as SSD for the purposes of Section 4.38(4) of the EP&A Act.

## 3.0 Site Analysis

This chapter of the EIS identifies the key features of the site and surrounds pertinent to the development and which the design of the proposal responds to.

### 3.1 About the Site

The Waterloo South Precinct Area extends across 10 street blocks within the inner-city suburb of Waterloo. Waterloo South is generally bound by Cope, Raglan, George, Wellington, Gibson, Kellick, Pitt and McEvoy streets. The site is located on the traditional land of the Gadigal people of the Eora Nation. The legal description of Waterloo South is detailed in **Table 2**. The location of the precinct is illustrated in **Figure 6** and **Figure 7** below.

 <b>Address</b>	6 John Street, 97-109 Cooper Street, 209-219, 229-231 & 247-251 Cope Street, 238-246, 248-254, 331-337 & 339-341 George Street, 232 & 250 Pitt Street and 74-76 Wellington Street, Waterloo	
 <b>Legal Description</b>	Refer to <b>Table 2</b> below	
 <b>Site Area</b>	Waterloo Estate (South) Area: 114,822m <sup>2</sup>  Survey Plan at <b>Appendix G</b> .	
 <b>Owner</b>	NSW Land and Housing Corporation (LAHC)	

**Figure 6** Location plan

**Table 2** Legal Description of Waterloo South

Address	Lot/DP
<b>Lots owned by NSW Land and Housing Corporation (land is subject to both the rezoning and the concept SSDA)</b>	
209-219 Cope Street, Waterloo	Lot 1 DP 217386
238-246 George Street, Waterloo	Lot 1 DP 225159
229-231 Cope Street Waterloo	Lot 3 DP 10721
6 John Street, Waterloo	Lot 1 DP 533762
97-109 Cooper Street, Waterloo	Lot A DP 105916, Lot B DP 105916, Lot C DP 105916, Lot 14 DP 10721,
248-254 George Street, Waterloo	Lot 2 DP 533678
232 Pitt Street, Waterloo	Lot 11 DP 635663, Lot 10 DP 635663
74-76 Wellington Street, Waterloo	Lot 1 DP 224728
331-337 George Street, Waterloo	Lot 3 DP 533680
247-251 Cope Street, Waterloo	Lot 1 DP 533679
339-341 George Street, Waterloo	Lot 1 DP 77168

Address	Lot/DP
250 Pitt Street, Waterloo	Lot 313 DP 606576
Cooper Street, Waterloo	Lot 3 DP 217386
<b>Lots owned by others (land that does <u>not</u> form a part of the concept SSDA)</b>	
221-223 Cope Street, Waterloo	Lot 6 DP 10721, Lot 7 DP 10721, Lot 9 DP 10721, Lot 8 DP 1147179
225-227 Cope Street, Waterloo	Lot 5 DP 10721, Lot 4 DP 10721
233 Cope Street, Waterloo	Lot 12 DP 1099410, Lots 1-41 SP 79210
116 Wellington Street, Waterloo	Lot 10 DP 10721, Lot 11 DP 10721
111 Cooper Street, Waterloo	Lot 15 DP 10721
291 George Street, Waterloo	Lot 10 DP 1238631, Lots 1-20 SP 96906
110 Wellington Street, Waterloo	Lot 101 DP 1044801, Lots 1-58 SP 69476
336 George Street, Waterloo	Lot 3 DP 10686
213-215 Cope Street, Waterloo	Lot 2 DP 217386

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

As shown in **Figure 7** surrounding suburbs include Redfern to the north, Green Square to the south, Alexandria to the west and Zetland to the east. This broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Waterloo Metro Quarter and OSD all contributing to the changing character of the area. These broader renewal projects are supported by proximity to a range of public transport services, including Redfern station, Green Square station, and Waterloo metro station, all of which are within walking distance of Waterloo South.



 Waterloo South Precinct Area

NOT TO SCALE 

**Figure 7** Aerial view of the Waterloo Estate and the Waterloo Estate (South) precinct

Source: Six Maps, modified by Beam Planning



From the 1960s, Redfern was the centre of the urban Aboriginal civil rights movement in Australia. The creation of Aboriginal-led services in the 1970s, including the Aboriginal Medical Service, the Aboriginal Legal Service, and the Aboriginal Housing Company, served as a powerful inspiration for self-determination among Aboriginal communities across the country.

From the early 2000's, the Aboriginal and Torres Strait Islander population in the area started to decline as new residential developments replaced former industrial sites. As of the 2021 Census, it was estimated 834 Aboriginal people remain living in the Redfern and Waterloo areas. Despite the urban transformation and industrialisation of the area over the past two centuries, Waterloo remains a site of cultural significance for many Aboriginal and Torres Strait Islander people, with one of the last major significant events being in relation to the Apology to Australia's Indigenous Peoples Speech by Prime Minister Kevin Rudd.

Redfern continues to host significant Aboriginal and Torres Strait Islander organisations, services, cultural institutions and businesses, including those that evolved from the earliest organisations established there. Many Aboriginal people still travel to Redfern to access community-controlled services, attend events, connect with family and friends, and sustain and pass on connections to the area's history and cultural significance.

Waterloo South is currently characterised by a concentration of low to medium rise residential flat buildings constructed during the 1950s to 1970s as part of the former public housing estate. The existing building stock comprises a mix of 3 storey slab-block and tower-form structures (refer to **Figure 10**). These buildings reflect their era of construction and provide a significant proportion of the precinct's social housing.

The buildings are reaching the end of their functional life, with ageing construction, outdated services and layouts that no longer meet contemporary standards for accessibility, safety, environmental performance or residential amenity. The site also contains older community facilities and infrastructure that require renewal to support current and future populations.

Although Waterloo South provides important access to social housing for diverse communities, the existing development pattern does not fully capitalise on the precinct's highly accessible inner-city location, its proximity to the Waterloo metro station, or its potential to deliver a more integrated, inclusive and high-performing urban neighbourhood.

**Existing  
Development**



**Figure 9** Existing buildings in Waterloo South

Source: CPTED Report prepared by Urbis



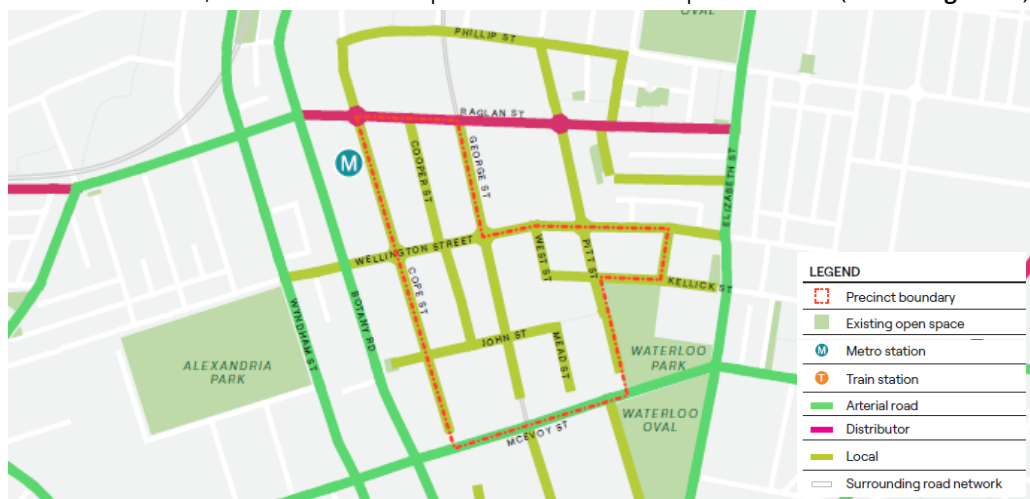
**Figure 10** Typical three storey walk-up in Waterloo South

Source: Design Report prepared by SJB

The site is served by arterial roads, heavy rail train stations, a metro station, bus routes and regional cycle routes. These connections mean access to Central Sydney is fast and efficient, with a full suite of transport options and low travel times. Access to most of Greater Sydney is relatively high through well connected and high-capacity railways and arterial roads.

Arterial roads connect the site to Greater Sydney, including Parramatta Road via Cleveland Street, the M8 motorway and Princes Highway via McEvoy Street, and Sydney Airport and North Sydney via the Eastern Distributor. McEvoy Street bounds the site to the south and is a classified road and arterial road. McEvoy Street is an important east-west link that connects to Botany Road and South Dowling Street. Botany Road is located to the west of the site and South Dowling Street is located further to the east of the site. Botany Road is a key corridor that connects the southern industrial lands and Sydney airport to the Sydney CBD in the north, whilst South Dowling Street provides connections to the city north and eastern suburbs. The site is surrounded by a series of local roads, with the intent of the precinct to become more pedestrianised (refer to **Figure 11**).

Infrastructure



**Figure 11** Extract of road network

Source: Urban Design Report prepared by SJB

The site is well located and in walking distance to several heavy rail and metro stations including Waterloo metro station, Green Square station, and Redfern station.

The City of Sydney have committed to improving active transport connectivity across the LGA. A new regional bike network runs directly through the site along George Street and provides connections to the broader network that spans the LGA. The City of Sydney has commended and completed sections of the bike path along Wellington Street which will improve the east-west connectivity of the site (refer to **Figure 12**).



**Figure 12** Public and active transport networks

Source: Urban Design Report prepared by SJB

<p><b>Easements and Covenants</b></p>	<p>The site is affected by several easements, including:</p> <ul style="list-style-type: none"> <li>• Gas main easements located: <ul style="list-style-type: none"> <li>– along the eastern side of George Street between Wellington Street and John Street; and</li> <li>– along the southern side of John Street between George Street and the proposed Mead Street.</li> </ul> </li> <li>• Cross-easements affecting proposed Block 2B.</li> <li>• Easement for overhang on the western side of Cooper Street at proposed Block 2B.</li> <li>• Easement for right of way on the western side of Cooper Street at proposed Block 2B.</li> <li>• Easement for railway transit on the south-eastern side of George Street.</li> <li>• The southern portion of Block 8, adjacent to McEvoy Street, is identified under the Sydney LEP 2012 as land to be reserved for acquisition for the purpose of road widening.</li> </ul>
<p><b>Services</b></p>	<p>The site is located within an existing urban area and currently contains all necessary services, including electricity, gas, water, communications, drainage and sewage. Future development will connect to these services with augmentation and upgrades as required, with any services no longer required to be decommissioned and capped. As part of the infrastructure delivery strategy, existing gas infrastructure will be capped at the block boundaries whilst existing infrastructure outside of the block boundaries will be retained.</p>
<p><b>Acid Sulphate Soils</b></p>	<p>The site contains class 5 Acid Sulphate Soils.</p>
<p><b>Contamination</b></p>	<p>The site contains potential sources of contamination, receptors and exposure pathways. Fill materials are present on the site and are impacted to varying degrees by heavy metals (notably lead), asbestos, TRH, and PAHs. These impacts are generally constrained to surface fill (0.2m to 0.5m) and natural underlying soils are generally free from impacts. Groundwater is also impacted by heavy metals and perfluorooctane sulfonate (PFOS), potentially from historical commercial/ industrial land-uses within the Waterloo locality.</p> <p>A precinct-wide remediation strategy has been prepared to support the concept SSDA (refer to <b>Appendix T</b>).</p>
<p><b>Topography</b></p>	<p>Waterloo South sits within a shallow valley framed by two distinct high points: a ridge along Pitt Street to the east and elevated land around Raglan Street to the north. Elevation ranges between approximately 13m above sea level (ASL) in the western extent of the site and approximately 22m ASL at the eastern extent.</p> <p>Contours fall toward the centre of the site around Cope, Wellington and George streets, creating a gentle depression that directs natural drainage south-east toward McEvoy Street and north-east toward Pitt Street.</p>
<p><b>Hydrology</b></p>	<p>Sheas Creek (brackish water body), is located approximately 800m to the south/southwest of the site. Sheas Creek flows to Alexandra Canal, which flows into the Cooks River (marine), approximately 1.3km to the southwest, which ultimately discharges into Botany Bay (marine), located around 6km from the site.</p>

## Stormwater and Flooding

The site is located near the centre of the Alexandra Canal Catchment, which is prone to overland flow flooding during intense rainfall events when the capacity of the piped stormwater system is exceeded (refer to the Flood Risk Assessment at **Appendix AA**). A new large-scale stormwater drain has been installed in recent years to assist in alleviating flooding in the wider Green Square area.

The site is serviced by a stormwater network of pits and pipes that generally drains to the west and ultimately discharges to Alexandra Canal (refer Drawing A01). Key elements of the network include drainage running west along Wellington Street (pipe diameters up to 900 mm) and Raglan Street (pipe diameters up to 450 mm), multiple drainage lines along Cope Street draining to a small open channel flowing west, and drainage of the George Street low point via multiple pipes connecting to a 300 mm diameter pipe running south from McEvoy Street.

In the vicinity of the site, flooding typically occurs as shallow overland flow moving generally east to west toward Cope Street. Flood depths are generally shallow across the steeper eastern portion of the site due to the local topography and relatively small contributing catchment. On the western portion of the site, runoff tends to collect within two localised topographic depressions near Wellington Street/Cope Street and along George Street near McEvoy Street.

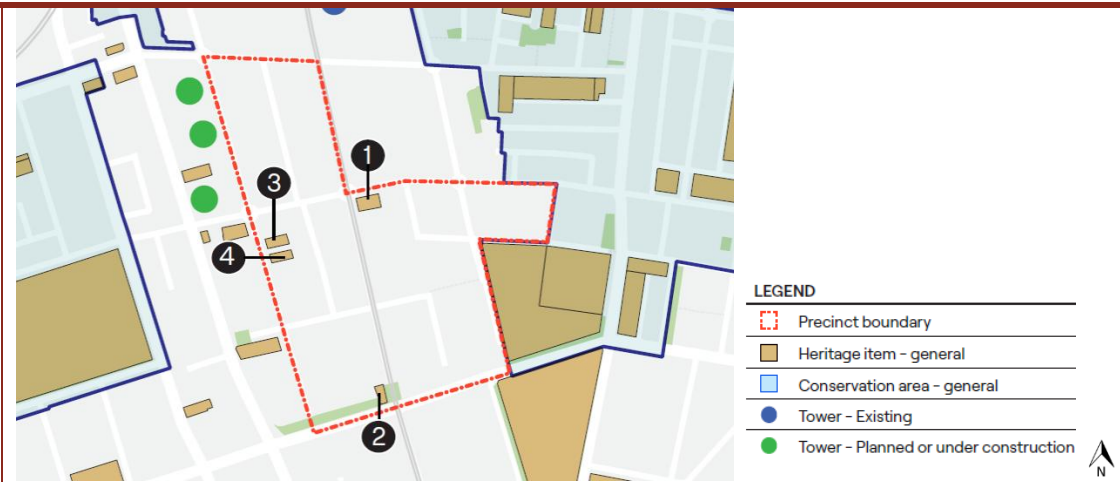
The underground pit and pipe network has limited function in larger storm events. During a 1% AEP design flood, the majority of runoff is conveyed overland. The most recent Council drainage capacity assessment (Alexandra Canal Catchment Flood Study Model Update – ARR2019 Hydrology, 2020) indicates that virtually all pipes within the site are at capacity during a 0.5 EY event (approximately equivalent to a 50% AEP event), contributing to the prevalence of overland flow pathways and localised ponding during heavier rainfall.

## Heritage

The Waterloo South Precinct Area contains a mix of local and State heritage items that reflect the area's historical development and contribute to its cultural significance, including:

- **SHR 01630 - Potts Hill to Waterloo Pressure Tunnel and Shafts:** The State heritage listed Potts Hill to Waterloo Pressure Tunnel and Shafts (SHR 01630), runs beneath the precinct at a depth of approximately RL -30 metres. The investigation into the pressure tunnel begun in 1914, with plans for the tunnel to span approximately 16 kilometres from Potts Hill Reservoir to the Waterloo Pumping Station (refer to **Figure 13**). Works commenced in 1933 within the installation of steel tube lining along the entire tunnel length.
- **I2077- Former Waterloo Pre-school:** The former Waterloo pre-school is located along the western edge of the precinct at 225 Cope Street, as pictured in **Figure 14**. The pre-school building dates back to 1870 where it was used as a congregational chapel before becoming a school in 1890. In 1918 the property was used as a Kindergarten school until 1999 when it was purchased by a private owner for their residence.
- **I2078 - 2-storey Victorian terrace houses (circa 1880):** To the south of the pre-school is heritage item I2078 which comprises a group of terrace houses (refer to **Figure 14**). This group of buildings are a representative example of a mid Victorian terrace group constructed during a period of subdivision in Waterloo.
- **I2085 - Duke of Wellington Hotel including interior:** The Duke of Wellington Hotel anchors the south-eastern corner of Wellington Street and George Street. The original hotel was constructed on the site in 1876. The current structure which replaced the original dates to 1929 and showcases the interwar free classic architectural style. The hotel as it stands today is pictured in **Figure 15**.
- **I2086 - Single-storey interwar building, Electricity Substation No 174:** The electricity substation occupies a prominent corner position at McEvoy and George Street (refer to **Figure 16**). The substation was established in the interwar period.

In addition to these on-site items, Waterloo South is immediately adjacent to the Waterloo Heritage Conservation Area and is located near several other conservation areas and individually listed heritage items (refer to **Figure 13**). This context highlights the need for a sensitive approach to urban renewal that respects existing heritage values while supporting contemporary redevelopment.



**Figure 13** Heritage Items and Heritage Conservation Areas Map (Waterloo South outlined in red)

Source: SJB



**Figure 14** Heritage items - I2077 former Waterloo pre-school (left) and - I2078 2-storey Victorian terrace houses (right)

Source: Statement of Heritage Impact prepared by Artefact



**Figure 15** Heritage item - 12085 - Duke of Wellington Hotel

Source: Statement of Heritage Impact prepared by Artefact



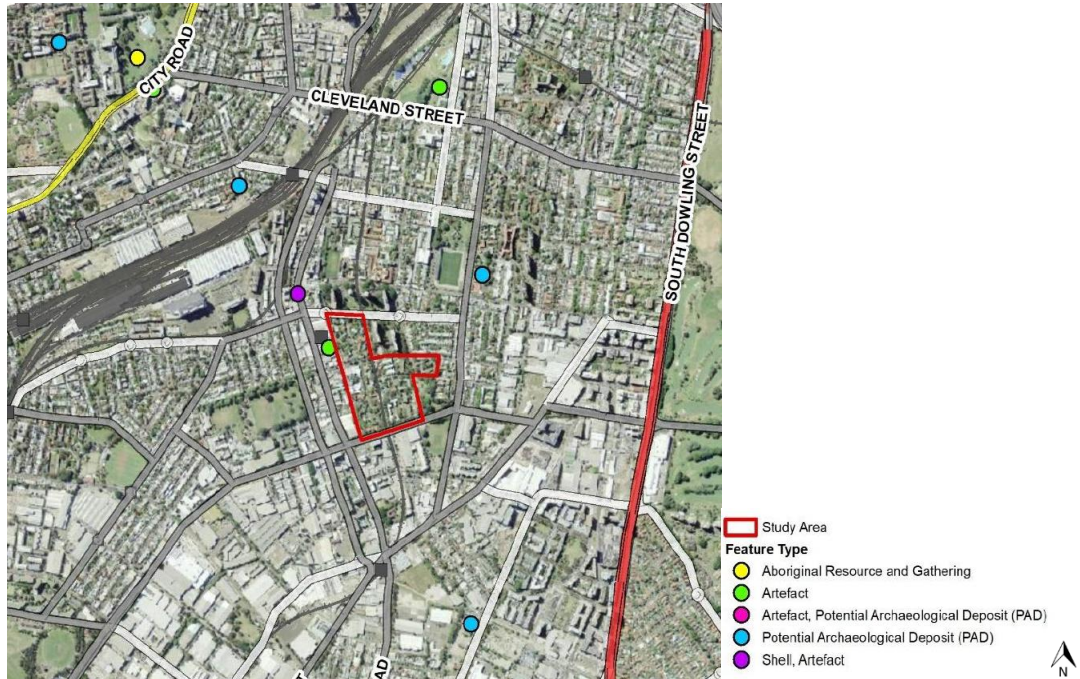
**Figure 16** Heritage item 12086 - Electricity Substation

Source: Statement of Heritage Impact prepared by Artefact

An AHIMS search was undertaken on the 22 August 2025 which determined the location of Aboriginal sites in relation to Waterloo South. The investigation comprised a search of a 2km x 2km area which surrounded the study area. A total of 18 AHIMS registered sites were located within the search area however no AHIMS sites are located within the Waterloo South study area. Whilst there are no Aboriginal sites located within the Waterloo South, there are two sites located within 200m of the site (refer to **Figure 17**).

An area of Potential Archaeological Deposits is likely located within the site based on its location within the Botany Sands. Given these findings, subsequent investigations will be required in connection with future detailed applications.

**Archaeology**



**Figure 17** Extent of AHIMS search

Source: *Archaeological Technical Report, prepared by Artefact*

The vegetation within the Waterloo South Precinct Area comprises a mixture of exotic and native species. There are a significant number of large, mature trees, particularly fig trees, that define the precincts urban and environmental character (refer to **Figure 18**). These trees provide shade, amenity, and microclimate benefits, and play a key role in mitigating the urban heat island effect. Many existing trees are located along George Street and McEvoy Street.

**Vegetation**



**Figure 18** Existing mature trees

Source: *Public Domain and Landscape Report prepared by ASPECT Studios*

### 3.3 Surrounding Context

The broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Waterloo Metro Quarter and OSD all contributing to the changing character of the area. These broader renewal projects are supported by proximity to a range of public transport services, including Redfern station, Green Square station, and Waterloo metro station, all of which are within walking distance of Waterloo South.

**Table 4** Surrounding Context

To the north, the precinct adjoins Waterloo Estate Central and North, which contain a mix of existing social housing (refer to **Figure 19**) and are significant areas earmarked for staged urban renewal. Beyond this, Redfern features medium- and high-density residential development, community facilities and employment uses. The broader Redfern area is experiencing substantial transformation, particularly around Redfern Station (refer to **Figure 20**), where mixed-use redevelopment, public domain upgrades and new community infrastructure are emerging. Several conservation areas and heritage items are also located to the north, contributing to the historic character of the neighbourhood.

North



**Figure 19** Turanga and Matavai public housing towers in Waterloo North  
Source: Urban Design Report prepared by SJB



**Figure 20** Redfern Station Entry  
Source: Urban Design Report prepared by SJB

South of the precinct, development transitions toward the Zetland neighbourhood, characterised by a mix of older terraces (refer to **Figure 21**), contemporary apartment buildings and repurposed industrial buildings that are gradually undergoing renewal. The area includes a number of small parks and local community assets that support neighbourhood amenity. The southern context also forms part of a wider corridor of ongoing regeneration extending toward Green Square, where major residential and mixed-use development is reshaping the urban landscape (**Figure 22**).

South



**Figure 21** Terrace Houses  
Source: Urban Design Report prepared by SJB



**Figure 22** Green Square Town Centre  
Source: Urban Design Report prepared by SJB

To the east, the precinct interfaces directly with the Waterloo Heritage Conservation Area, a fine-grain residential neighbourhood containing Victorian and Federation-era dwellings and a strong, intact streetscape character. The eastern context includes several additional conservation areas within walking distance, reinforcing the heritage significance of the broader locality. Smaller pocket parks like Waterloo Park (**Figure 23**) contribute local open space, while bus routes along nearby streets provide strong connectivity to the eastern suburbs and the CBD. Our Lady of Mt Carmel Catholic primary school and Church (**Figure 26**) is located immediately east of the site across Pitt Street.

>  
East



**Figure 23** Waterloo Park  
Source: Urban Design Report prepared by SJB



**Figure 24** Our Lady of Mt Carmel Catholic Church  
Source: Churches Australia

To the west, the precinct is anchored by Alexandria Park (**Figure 25**), a large and well-used public open space that provides recreation areas, community facilities and mature tree canopy. The recently completed Waterloo metro station sits immediately west of the estate (**Figure 26**), offering high-frequency services and forming a major infrastructure investment for the precinct and surrounding neighbourhoods. The western corridor also contains a mix of residential and community buildings, along with emerging redevelopment opportunities associated with the metro station precinct and broader renewal in Waterloo and Alexandria.

<  
West



**Figure 25** Alexandria Park  
Source: Urban Design Report prepared by SJB



**Figure 26** Waterloo Metro Station Entry  
Source: Urban Design Report prepared by SJB

Recent significant investment has been made into renewing Waterloo and surrounding inner city suburbs into vibrant mixed use precincts, leveraging proximity to public transport hubs. The following development is relevant to the context of Waterloo South.

**Table 5** Developments in the vicinity of the site

Project Name	Description	Status (at the time of writing)	Proximity to site
<b>D/2025/920</b> 216-220 Wyndham Street Alexandria NSW 2015	A DA is under assessment for the demolition of existing structures, tree removal and the construction of an 11 storey mixed use building to be used for the purpose of affordable housing with ground floor commercial uses.	Under assessment	200m west

Project Name	Description	Status (at the time of writing)	Proximity to site
<b>SSD-63067458</b> 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	Approved September 2025	100m east
<b>D/2025/201</b> 1049, 1051,1053-1055 Bourke Street, Waterloo	DA to Council for demolition of existing structures and construction of a mixed use development containing retail/ business premises, co-living accommodation and basement parking. The approved development comprises a part 5, part 6 storey mixed use development with 3 retail tenancies, 107 co-living accommodation rooms and various communal facilities.	Approved 27 August 2025 Under construction	420m south
<b>D/2020/1419</b> 219-231 Botany Road, Waterloo	Demolition, tree removal, excavation, remediation and construction of a mixed-use development comprising residential apartments and a retail tenancy.	Approved 4 August 2022 Under construction	200m south

A brief description of development at the Waterloo Metro Quarter is provided below. Further detail is provided below the table.

<b>Waterloo Metro Quarter</b>			
<b>SSD-79307746</b> Waterloo Metro Quarter – Central Precinct	The application seeks consent for a mixed -use development including: <ul style="list-style-type: none"> <li>a residential tower with a maximum height of RL 99.65 (25 storeys) containing 500 co -living apartments</li> <li>634m<sup>2</sup> of commercial floor space</li> <li>2,330m<sup>2</sup> of community floor space including a not -for-profit child -care centre at Levels 1 and 2</li> <li>total gross floor area of 17,444m<sup>2</sup></li> <li>vehicle access from Cope Street to basement car park</li> <li>use of shared loading dock accessed off Botany Road</li> <li>publicly accessible east -west through site links, landscaping and public domain works.</li> </ul>	On public exhibition until 15 January 2026	Immediately opposite the site on Cope Street.
<b>SSD-79307758</b> Waterloo Metro Quarter – Northern Precinct	The application seeks consent for construction of a mixed -use development including: <ul style="list-style-type: none"> <li>two residential towers with maximum heights of RL 107.5 (25 storeys) and RL 116.9 (28 storeys) respectively</li> <li>314 apartments comprising 275 market apartments and 39 affordable housing apartments</li> <li>5,696m<sup>2</sup> of commercial floor space</li> <li>total gross floor area of 32,484m<sup>2</sup></li> <li>vehicle access from Cope Street to basement car park</li> <li>loading dock accessed off Botany Road, shared with Central Precinct</li> <li>publicly accessible north -south through site link, landscaping and public domain work</li> </ul>	On public exhibition until 15 January 2026	Immediately opposite the site on Cope Street.
<b>SSD-79307765</b> Waterloo Metro Quarter – Second Amending concept	The application seeks consent for amendments to the existing concept approval to allow a revised mix of land uses by: <ul style="list-style-type: none"> <li>amending the building envelopes, building height and land use for the Northern Precinct from the</li> </ul>	On public exhibition until 15 January 2026	Immediately opposite the site on Cope Street.

Project Name	Description	Status (at the time of writing)	Proximity to site
	<p>approved 17 -storey office tower to two proposed residential towers of 21 and 24 storeys</p> <ul style="list-style-type: none"> <li>amending the building envelopes and land use for the Central Precinct from the approved apartment tower with market apartments to a proposed co -living housing tower</li> <li>Note: there is no change proposed to the overall gross floor area of the concept approval (68,750m<sup>2</sup>)</li> </ul>		
<p><b>SSD 9393 MOD 1 and SSD 10437</b> Waterloo Metro Quarter Over Station Development – Southern Precinct</p>	<p>These applications were for a concurrent assessment of a modification application to the Waterloo Metro Quarter concept approval (SSD 9393 MOD 1) and a State significant development application (SSD 10437). The SSD sought approval for the design and construction of two residential buildings, comprising:</p> <ul style="list-style-type: none"> <li>a student housing building of 25 storeys on the corner of Botany Road and Wellington Street, able to accommodate up to 474 students</li> <li>a social housing building of 9 storeys on the corner of Wellington Street and Cope Street with 70 social housing dwellings</li> </ul>	<p>Approved on 30 July 2021 Last modified on 19 June 2024 (Mod 3) Under construction</p>	<p>Immediately opposite the site on Cope Street.</p>
<p><b>SSD-10441</b> Waterloo Metro Quarter Over Station Development</p>	<p>Amending concept Application for the Waterloo Metro Quarter Over Station Development:</p> <ul style="list-style-type: none"> <li>replace the approved 29 storey building envelopes within the Northern Precinct of the site with new building envelopes up to 17 storeys</li> <li>change the use of the Northern Precinct building envelopes from residential to office and retail premises</li> <li>amend the podium level of the Central Precinct building envelope</li> </ul>	<p>Approved 17 June 2021</p>	<p>Immediately opposite the site on Cope Street.</p>
<p><b>SSD-10440</b> Waterloo Metro Quarter Over Station Development – Northern Precinct</p>	<p>Design and construction of a 9 to 15 storey commercial building within the Northern Precinct of the Waterloo Metro Quarter Over Station Development.</p>	<p>Approved 23 September 2021 Not proceeding</p>	<p>Immediately opposite the site on Cope Street.</p>
<p><b>SSD-10439</b> Waterloo Metro Quarter Over Station Development – Central Precinct</p>	<p>Design and construction of a mixed use building with commercial premises, community facilities and residential apartments within the Central Precinct of the Waterloo Metro Quarter Over Station Development</p>	<p>Approved 24 November 2021 Not proceeding</p>	<p>Immediately opposite the site on Cope Street.</p>

## Waterloo Metro Quarter

The Waterloo Metro Quarter (WMQ) borders the Waterloo South at the northwest. The WMQ redevelopment is centred around the delivery of the Waterloo metro station, which is part of the broader Sydney Metro City and Southwest line.

The commitment to, and subsequent delivery of a metro station at Waterloo was a catalyst for development in the area. The metro station provides residents, workers and visitors to the site access to the Sydney Metro network, connecting to surrounding metropolitan and strategic centres, such as Central Sydney, St Leonards and Macquarie Park.

Aside from the new metro station, the WMQ is made up of four buildings centred around a public plaza. The four buildings, as approved, comprise a mix of land uses including social and affordable housing, student accommodation, market housing, community facilities, and commercial and retail premises. An illustration of the future public plaza and northern and central buildings at WMQ is provided at **Figure 27**.

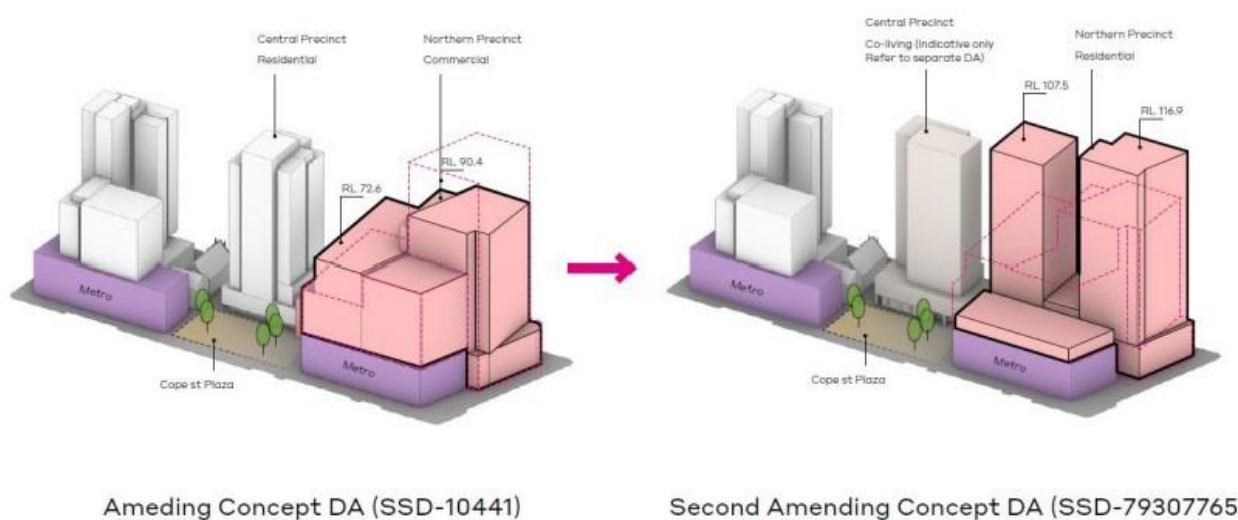


**Figure 27** Photomontage of Waterloo Metro Quarter (SSD10439) viewed from Cope Street

Source: Urban Design Report – SSD10439

As outlined in **Table 5** the SSDAs for both the northern and central precincts are not proceeding due to market demand shifts following the COVID-19 pandemic. Accordingly, a new ‘Amending concept SSDA’ and concurrent ‘Detailed SSDA’ applications have been lodged for these precincts (refer to **Figure 28**). The main change to the approved development is as follows:

- Converting the central tower from residential to co-living.
- Converting the commercial office block in the north to two residential towers.
- No change to the maximum permitted GFA, as the floorspace will be redistributed within the revised envelopes. The amended proposal will not exceed the permissible building height for the site under the Sydney LEP 2012.
- The new concept SSDA will facilitate the delivery of 314 residential units, including 275 market and 39 affordable housing units (in addition to the approved social and student accommodation in the southern precinct).



**Figure 28** Comparison of the building envelopes within the concept SSDAs

Source: Urban Design Report – SSD-79307765)

The Amending concept SSDA (SSD-79307765) and the detailed SSDAs for the Central Precinct (SSD-79307746) and Northern Precinct (SSD-79307758) were on public exhibition which concluded on the 15 January 2026. After the public exhibition period, each proposal will undergo the standard assessment process prior to determination.

## 4.0 Strategic Planning Context

This chapter identifies the key strategic issues that are relevant to the assessment of the proposed development, including the project's consistency with relevant Government policies, the strategic planning framework, the relationship of the development with other surrounding development, and any planning agreements. The chapter also analyses the alternative development options explored and justifies the current proposal in context of the strategic planning framework.

### 4.1 Strategic Planning Framework

This section identifies the key strategic planning matters that are relevant to the assessment of the proposed development, including the project's consistency with relevant Government policies.

**Table 6** Summary of strategic context

Strategic Plan	Strategic Context
<b>National Housing Accord 2022</b>	<p>Australia is facing a significant and persistent housing supply challenge, with the cost of renting or purchasing a home now representing the largest living expense for most households. In response, the Australian Government's National Housing Accord (2023) commits to facilitating 1.2 million well-located homes between 2024 and 2029. The Accord places strong emphasis on delivering new dwellings in accessible, infrastructure-rich areas close to transport, services, employment and education.</p> <p>Despite being the most populous state, with the fastest population growth, the highest median rents and the highest median house prices, NSW continues to under-deliver on new housing relative to demand. Recent comparative analysis by the NSW Productivity Commission confirms that NSW lags behind other states in the number of completed homes, underscoring the urgency for well-located large-scale housing delivery. To support this national target, the NSW Government has introduced a suite of reforms designed to accelerate housing delivery, improve affordability and remove barriers to development in strategically important locations.</p> <p>The Waterloo South concept development directly advances the intent of the National Housing Accord by delivering high-density urban renewal in a central, transport-rich location, immediately adjacent to Waterloo metro station and within one of Sydney's most connected inner-city precincts. The proposed development provides:</p> <ul style="list-style-type: none"> <li>• Approximately 3,300 new dwellings, significantly contributing to the supply of well-located homes within the approximate Accord's timeframe.</li> <li>• A commitment that a minimum of 30% of the residential GFA will be delivered as social housing and that approximately 20% will be provided for affordable housing, supporting both housing diversity and equitable access to housing opportunities. A minimum 7% of residential GFA is proposed as affordable housing that will be owned and managed by a community housing provider – proposed as City West Housing (provided in perpetuity). Any additional affordable housing delivered in the precinct must be used as affordable housing for a minimum of 25 years.</li> <li>• High-quality mixed-tenure development, integrating social, affordable and private housing within a cohesive and inclusive neighbourhood.</li> <li>• Publicly accessible open space and an enhanced public realm, reinforcing liveability and community benefit as core components of precinct renewal.</li> <li>• An authentic mixed-use environment, co-locating housing with essential services, community infrastructure and high-frequency public transport.</li> </ul> <p>In combination, these outcomes demonstrate strong alignment with the national and state imperative to deliver more homes where people want and need to live. The Waterloo South concept development offers a contemporary model of precinct-scale renewal that responds to immediate housing challenges while supporting long-term urban, social and economic outcomes consistent with the objectives of the National Housing Accord.</p>
<b>Housing 2041 – NSW Housing Strategy</b>	<p>Housing 2041 is the NSW Government's 20-year vision for the delivery of housing across the state. The strategy reiterates the Government's 20-year commitment to achieving secure, comfortable, diverse, affordable and resilient housing. Housing 2041 establishes four pillars which underpin the future of housing, and the proposed development is closely aligned with each of these pillars in the following manner:</p> <ul style="list-style-type: none"> <li>• <b>Supply:</b> the proposed development will unlock significant housing supply in an inner-city location that is well-connected to jobs, services, and transport infrastructure. The precinct is adjacent to the newly completed Waterloo metro station, providing high-frequency access to the Sydney CBD, Parramatta, and key employment centres. By facilitating increased density in a well-serviced area, the proposed development aligns with NSW Housing Strategy goals to optimise housing supply in strategic locations while avoiding urban sprawl.</li> </ul>

- **Diversity:** the Waterloo South renewal will deliver a range of housing typologies and tenure types, including social, affordable, and market housing, ensuring a balanced and inclusive community. The precinct's design considers the needs of different household types, including families, single-person households, and older residents. Accessible and adaptable housing will also be incorporated, ensuring that housing supply meets changing demographic and social needs over time.
- **Affordability:** the redevelopment prioritises affordable and social housing, ensuring that lower-income households and vulnerable residents have access to secure accommodation. More than 1,500 new social and affordable homes will be delivered on the site. The project incorporates mixed tenure housing, including affordable rental housing for key workers, providing long-term housing security and addressing affordability challenges in the City of Sydney.
- **Resilience:** the redevelopment of Waterloo South integrates climate-responsive design, sustainability initiatives, and resilient infrastructure to ensure long-term liveability. Buildings will incorporate energy-efficient materials, green infrastructure, and water-sensitive urban design principles to enhance sustainability. The project also prioritises public open spaces, walkability, and active transport connections, ensuring that the precinct remains adaptable and resilient to climate change impacts while supporting a healthy and connected community.

### Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. The Region Plan provides housing targets to inform the District Plans for a 0-5-year timeframe, as well as Council specific 6-10-year targets for LGAs.

The 0-5 year housing target for the Eastern City was 46,550 and the strategic housing target is 157,5000. The consistency of the proposed development with the directions of the Greater Sydney Region Plan is outlined below.

- **Objective 1: Infrastructure supports the three cities** - The redevelopment of Waterloo South leverages existing infrastructure investments, ensuring efficient land use and urban renewal. The precinct benefits from the recently completed Waterloo metro station, upgraded Redfern station, and improved active transport networks. By delivering higher-density development in a well-serviced urban area, the proposal maximises infrastructure efficiency and reduces the need for new, large-scale infrastructure expansions.
- **Objective 5: Benefits of growth realised by collaboration of governments, community and business** - The renewal of Waterloo South is being delivered through a collaborative approach between the NSW Government, the City of Sydney, Stockland, CHPs, and community stakeholders. This coordinated effort ensures that urban growth aligns with local needs and strategic priorities. Extensive community consultation is integrated into the planning and delivery process, ensuring that local voices shape the precinct's future. The partnership approach also facilitates the provision of diverse housing typologies, improved open spaces, and essential social infrastructure, ensuring the benefits of growth are equitably distributed.
- **Objective 6: Services and infrastructure meet communities' changing needs** - The Waterloo South precinct is designed to support a growing and evolving population by integrating essential services and infrastructure. The redevelopment will deliver new and enhanced public spaces, community facilities, and improved pedestrian and cycling connections. The provision of new social and affordable housing ensures that vulnerable populations have access to secure accommodation, while the precinct's design allows for future adaptability in response to community needs. The integration of community services and recreational services will further support a vibrant and sustainable community.
- **Objective 7: Communities are healthy, resilient and socially connected** - The precinct will prioritise health and well-being through high-quality urban design, green spaces, and active transport infrastructure. Public open spaces will be provided to encourage social interaction, physical activity, and access to nature. The proposal also promotes a mix of housing typologies and tenure types, ensuring an inclusive and socially connected community. Additionally, the development will incorporate climate-responsive design, improving resilience to extreme weather events and ensuring sustainable living environments.
- **Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods** - Waterloo South is known for its rich cultural diversity, and the redevelopment will reinforce this character by providing housing options that cater to people from various socio-economic backgrounds. The inclusion of social and affordable housing ensures that long-term residents can remain in the area, preserving community ties. The precinct will also incorporate public art, cultural facilities, and spaces for community events, celebrating and enhancing the local identity.
- **Objective 10: Greater housing supply** - The redevelopment of Waterloo South will facilitate the delivery of approximately 3,300 new dwelling significantly contributing to Greater Sydney's housing supply targets. By enabling higher-density development in a well-connected location, the proposal aligns with state and housing strategies aimed at meeting Sydney's growing population demands. The precinct will accommodate a mix of housing typologies, ensuring that supply increases across multiple market segments.

Strategic Plan	Strategic Context
	<ul style="list-style-type: none"> <li>• <b>Objective 11: Housing is more diverse and affordable</b> - The renewal of Waterloo South will deliver a mix of housing tenures, including market, affordable, and social housing, ensuring diversity and affordability. The project prioritises the retention and expansion of social housing, addressing the significant demand in the City of Sydney LGA. The inclusion of affordable rental housing will support key workers and very low- to moderate-income households, promoting socio-economic diversity within the precinct.</li> <li>• <b>Objective 12: Great places that bring people together</b> - The precinct will be designed to foster a strong sense of community through high-quality public spaces, improved streetscapes, and active ground-level uses. New parks, community centres, and pedestrian-friendly streets will enhance social interactions and improve the overall liveability of the area. The urban renewal strategy incorporates placemaking principles, ensuring that public spaces are vibrant, safe, and welcoming for residents and visitors alike.</li> <li>• <b>Objective 13: Environmental heritage is identified, conserved and enhanced</b> - The redevelopment of Waterloo South acknowledges the area's cultural and environmental heritage. Key heritage buildings and elements will be preserved and the two-storey terrace houses integrated into the new urban fabric. The planning framework ensures that Aboriginal and European heritage values are respected through adaptive reuse strategies, public interpretation initiatives, and culturally sensitive design. The precinct will also prioritise sustainable development, incorporating green infrastructure and environmentally responsible building materials.</li> <li>• <b>Objective 14: A Metropolis of Three Cities - integrated land use and transport creates walkable and 30-minute cities</b> - The Waterloo South concept development aligns with the Metropolis of Three Cities vision by ensuring that residents have access to jobs, services, and amenities within a 30-minute travel radius. The integration of higher-density residential development with high-frequency public transport connections, such as the Waterloo metro station, supports the creation of a walkable, transit-oriented community. The redevelopment enhances pedestrian and cycling infrastructure, reducing reliance on private vehicles and contributing to a more sustainable urban environment.</li> <li>• <b>Objective 30: Urban tree canopy cover is increased</b> - The concept plan prioritises the protection and enhancement of urban tree canopy. The proposal will see the retention of approximately 50% of high value trees and 50% of moderate value trees and provides for increased tree canopy coverage from existing condition.</li> </ul>
<b>Eastern City District Plan</b>	<p>The Eastern City District Plan underpins the Greater Sydney Region Plan and sets out the 20-year vision for the District through 'Planning Priorities' that are linked to the Region Plan. Under this plan, the suburb of Waterloo is identified as being adjacent to the strategic centre of Green Square and is mapped within the light rail investigation area. Since the publication of this plan, the Waterloo metro station which is part of the broader Sydenham to Tallawong route has been constructed and is now operational. The proposed development directly supports the following planning priorities:</p> <ul style="list-style-type: none"> <li>• <b>Planning Priority E3: Providing services and social infrastructure to meet people's changing needs</b> - The proposal seeks to add new and enhanced community infrastructure, including flexible community spaces, and the potential for access to childcare and education, and improved health and wellbeing facilities within the community use areas into the precinct.</li> <li>• <b>Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities</b> - The renewal of Waterloo South prioritises health and well-being through high-quality public spaces, pedestrian-friendly streets, and access to recreational facilities. The proposed development will incorporate public art and community spaces to celebrate Waterloo's diverse cultural identity. Additionally, the development enhances social connectivity by providing a mix of housing tenures, ensuring an inclusive and integrated community.</li> <li>• <b>Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs services and public transport</b> - The Waterloo South concept development will significantly increase housing supply, delivering a mix of market, social, and affordable housing options. The precinct's location adjacent to the Waterloo metro station and within walking distance of Redfern station ensures residents have seamless access to jobs, services, and public transport. The provision of diverse housing typologies ensures that the precinct accommodates various household types and income levels, contributing to housing affordability and choice.</li> <li>• <b>Planning Priority E6: Creating and renewing great places and local centres and respecting the district's heritage</b> - The urban renewal of Waterloo South will enhance the local character while respecting the area's rich heritage. The concept plan incorporates design excellence principles to ensure high-quality urban design and public realm improvements. Heritage elements within the precinct will be identified, conserved, and integrated into future development, ensuring that Waterloo's historical significance is celebrated within a contemporary setting.</li> <li>• <b>Planning Priority 18: Delivering high quality open space</b> - The development of Waterloo South will significantly increase the provision of open space by enhancing existing green links, and delivering new parks, plazas and canopy cover to support liveability and wellbeing.</li> <li>• <b>Planning Priority E19: Reducing carbon emissions and managing energy, water and waste efficiently</b> - The renewal project is committed to ensuring sustainable outcomes are achieved at the site. This will be achieved by incorporating the following sustainable design practices low-carbon building design, renewable</li> </ul>

Strategic Plan	Strategic Context
	<p>energy integration, and water-sensitive urban design principles. The development will prioritise energy efficiency, waste reduction strategies, and sustainable transport options, such as improved cycling infrastructure and pedestrian-friendly streets. These initiatives align with broader net-zero emissions targets and contribute to Greater Sydney's transition towards a more sustainable urban future.</p> <p>Through its focus on integrated land use and transport, mixed-tenure housing delivery, improved social infrastructure, and high-quality public domain outcomes, the concept SSDA gives clear effect to the strategic directions of both the Greater Sydney Region Plan and the Eastern City District Plan. The Waterloo South renewal is a model urban renewal project that directly supports regional and district objectives for a more equitable, sustainable and liveable Sydney.</p>
<p><b>City of Sydney Local Strategic Planning Statement 2020</b></p>	<p>The concept SSDA provides a framework to support future development which directly responds to the strategic directions of the Sydney LSPS to enable a liveable, inclusive and connected city. The proposal aligns with the principles of the City of Sydney LSPS as follows:</p> <ul style="list-style-type: none"> <li>• <b>Supporting community wellbeing with social infrastructure</b> - The redevelopment of Waterloo South leverages recent State investment, including the Waterloo metro station and upgrades to Redfern station, ensuring that future housing and employment opportunities are supported by efficient transport, utility and social infrastructure. The concept proposal envisages a range of active and community uses which will support community wellbeing and improve precinct vibrancy and access to necessary services.</li> <li>• <b>A creative and socially connected city</b> - The proposal will facilitate the orderly development of Waterloo South which prioritises social infrastructure delivery, ensuring access to community uses such as health, education, childcare, and other community services. The project identifies the proposed location for new public spaces that will foster social interaction and community engagement.</li> <li>• <b>Creating great places</b> - The renewal of Waterloo South is driven by placemaking principles that enhance the character, identity, and functionality of the precinct. High-quality public domain upgrades, new parks, improved streetscapes, and active transport connections will contribute to a more vibrant and liveable urban environment. The concept SSDA sits within a design excellence framework which ensures that future buildings and public spaces contribute to a cohesive and visually appealing precinct, enhancing the local identity and sense of place.</li> <li>• <b>New homes for a diverse community</b> - The concept SSDA will facilitate the delivery of a mix of housing types and tenures, ensuring a socially inclusive and diverse community. Future development will provide a combination of social, affordable, and market housing, catering to a broad spectrum of income levels and household compositions. The precinct's housing strategy aligns with NSW Housing Strategy and City of Sydney housing policies, supporting key workers, families, and vulnerable populations.</li> <li>• <b>Open, accountable and collaborative planning</b> - The renewal of Waterloo South is being delivered through a transparent and community-focused planning process. Extensive community consultation and stakeholder engagement have been embedded in the project's planning and design stages to ensure that local voices shape the precinct's future. The project aligns with state and local strategic plans, ensuring that development outcomes are balanced, equitable, and aligned with broader metropolitan growth objectives.</li> </ul>
<p><b>City of Sydney Local Housing Strategy 2021</b></p>	<p>The proposed development also gives effect to the City of Sydney Local Housing Strategy's core priorities for well-located, diverse and affordable housing supported by infrastructure.</p> <ul style="list-style-type: none"> <li>• <b>Priority H1: Facilitating more homes in the right locations</b> - The concept SSDA for Waterloo South will enable the delivery of a significant number of new homes in a highly accessible, well-serviced urban location. By concentrating higher-density development around the Waterloo metro station and existing transport links, the precinct aligns with state and regional housing strategies aimed at accommodating Sydney's growing population in strategic, well-connected areas. This approach optimises land use, ensuring that housing supply is increased in a way that supports sustainable urban growth.</li> <li>• <b>Priority H2: Coordinating housing growth with the delivery of infrastructure</b> - The proposed development will facilitate the renewal of Waterloo South which leverages existing transport, water, energy, and social infrastructure, reducing the need for costly, large-scale infrastructure expansions. The recently completed Waterloo metro station, upgraded Redfern station, and enhanced active transport networks ensure that future residents will benefit from efficient, multi-modal connectivity. Additionally, future development will include new and improved public spaces, community facilities, and essential services, ensuring that infrastructure keeps pace with housing growth to support a well-functioning, liveable community</li> <li>• <b>Priority H4: Increasing the diversity and number of homes available for lower-income households</b> - The concept SSDA proposes an indicative distribution of land uses to guide the future redevelopment of Waterloo South which prioritises the inclusion of affordable rental housing for very low- to moderate-income households. By ensuring that a minimum 50% of residential GFA is designated as either social or affordable housing, the precinct supports Sydney's broader housing affordability objectives. The provision of lower-cost rental options will help key workers and vulnerable populations remain in a well-serviced urban area with access to jobs, transport, and amenities.</li> </ul>

Strategic Plan	Strategic Context
	<ul style="list-style-type: none"> <li>• <b>Priority H5: Increasing the amount of social and supported housing</b> - The future development of Waterloo South will increase the amount of social and affordable housing that exists on the site, addressing the growing demand for secure, long-term accommodation for vulnerable populations. The concept SSDA identifies the indicative staging of the redevelopment which will ensure that existing social housing residents are not displaced in the long term, while also increasing the overall supply of social and supported housing within a mixed-tenure environment. This approach integrates social housing with private and affordable homes, promoting social inclusion and reducing housing segregation.</li> <li>• <b>Priority H6: Improving NSW Government controlled site outcomes</b> - The Waterloo South renewal is a collaborative initiative between the NSW Government, City of Sydney, Stockland, Community Housing Providers, and community stakeholders ensuring a coordinated approach to urban renewal. The planning and delivery process incorporates extensive community consultation, ensuring that local voices shape the precinct's future. The proposal also promotes best-practice urban design, sustainability measures, and place-based planning principles, setting a benchmark for NSW Government-controlled site outcomes.</li> <li>• <b>Priority H7: Increasing liveability, sustainability and accessibility through high-quality residential design</b> - The concept SSDA has been designed to facilitate enhanced liveability through the delivery of high-quality public spaces, improved streetscapes, and vibrant ground-level uses. New parks, pedestrian-friendly streets, and community hubs will foster a strong sense of place and belonging. Future development will consider sustainability at its core, with climate-responsive design, green infrastructure, and energy-efficient buildings incorporated within the development. The renewal will also prioritise accessibility, ensuring that homes and public spaces cater to people of all ages and abilities, creating a resilient, inclusive, and sustainable urban community.</li> </ul>
<b>NSW Net Zero Plan – Stage 1: 2020-2030</b>	<p>The concept SSDA will facilitate development that consists of high performance building designs that will meet both the BASIX and NABERS benchmarks and promote energy efficiency through embedded infrastructure and sustainability initiatives. These sustainability commitments are detailed in <b>Section 6.5.8</b> and <b>Section 9.18</b> of the EIS and at <b>Appendix FF</b>.</p>
<b>State Infrastructure Strategy 2022-2042</b>	<p>The NSW Government's response to the State Infrastructure Strategy 2022–2042: Staying Ahead emphasises delivering “the right projects in the right place at the right time” and integrating infrastructure investment with land-use planning to support liveability, productivity and long-term growth.</p> <p>The Strategy recognises that access to “affordable and quality housing” is a key enabler of prosperous and thriving communities, and supports the delivery of secure, affordable and diverse housing. It also explicitly promotes planning outcomes that deliver more “housing, jobs, amenities and services” in locations where there is spare capacity in existing and planned infrastructure and calls for strategic land use plans to consider social and affordable housing in locations well-connected to key infrastructure, services and amenities.</p> <p>Consistent with these directions, the concept SSDA provides a framework for the future development of Waterloo South which will be undertaken across several years. The concurrent Rezoning Proposal will better integrate the planning framework with infrastructure and service planning by ensuring the precinct's permissible floor space can be delivered within an achievable and high-quality built form, and by facilitating a broader mix of activity and service uses (including community uses) along active frontages. This approach supports a coordinated, precinct-based delivery model, leverages major investment in mass transit and supporting infrastructure, and improves certainty that growth, housing delivery (including social and affordable housing outcomes), amenity and public domain performance can be realised in an orderly and efficient manner.</p>
<b>Better Placed</b>	<p><i>Better Placed</i> is a design policy that aims to improve the quality of the built environment. It promotes and supports better outcomes for places and spaces in response to the challenges faced in NSW including health, growth and urban renewal. Ultimately, the policy prioritises the community to ensure that all future development improves quality of life. The proposed development satisfies the following objectives below:</p> <ul style="list-style-type: none"> <li>• <b>Better fit:</b> The proposed development facilitates the delivery of a large-scale urban renewal project, the planning for which has evolved over several years. The renewal of Waterloo South is consistent with the established strategic vision for the site and will deliver high-quality environmental, social and economic outcomes. The proposed concept envelopes have been designed with regard to the existing and evolving character of the surrounding area, ensuring an appropriate transition in scale and maximising amenity for future residents and the broader community.</li> <li>• <b>Better performance:</b> The concept plan has been designed to maximise positive sustainability outcomes across the precinct by establishing clear environmental performance benchmarks to be achieved at the detailed design stage. The accompanying ESD Strategy identifies minimum sustainability performance targets, including benchmarks for Green Star, BASIX, NatHERS and NABERS. These measures will support reduced operational energy and water consumption, improved thermal comfort, and enhanced long-term environmental performance across the development.</li> </ul>

Strategic Plan	Strategic Context
	<ul style="list-style-type: none"> <li>• <b>Better for community:</b> The Waterloo South renewal will deliver approximately 3,300 new dwellings, including a minimum of 30% social and approximately 20% affordable housing, ensuring that lower-income households and vulnerable residents have access to secure, well-located accommodation. The redevelopment integrates housing with essential services, high-quality public spaces, and employment opportunities, all within close proximity to public transport. This holistic approach supports access to employment, community uses and social interaction, contributing to the creation of an inclusive, connected and diverse community.</li> <li>• <b>Better for people:</b> The proposal prioritises human-centred design through the provision of legible, safe and accessible public spaces that encourage walking, social interaction and everyday activity. Building layouts, public domain design and pedestrian connections have been carefully considered to maximise amenity, sunlight, safety and comfort. The inclusion of open spaces, communal areas and supporting infrastructure promotes health and wellbeing for residents and visitors of all ages and abilities.</li> <li>• <b>Better working:</b> The concept proposal includes a minimum of 15,000m<sup>2</sup> of non-residential gross floor area, supporting a mix of retail, community and employment-generating uses. These uses will contribute to precinct activation, provide local employment opportunities, and support day-to-day needs of residents. The integration of non-residential uses at ground level enhances vibrancy, passive surveillance and the overall functionality of the precinct.</li> <li>• <b>Better value:</b> The redevelopment represents an efficient and strategic use of public land, delivering long-term social, economic and environmental value. By co-locating housing, transport, services and employment within a single, well-planned precinct, the proposal maximises infrastructure investment, reduces reliance on private vehicles, and supports sustainable urban growth. The significant provision of social and affordable housing further delivers enduring public benefit and aligns with broader State priorities.</li> <li>• <b>Better look and feel:</b> The concept design establishes a cohesive and high-quality architectural and landscape framework that responds to the local context and reinforces a strong sense of place. Building form, scale and articulation have been designed to create an identifiable precinct character while maintaining visual interest and human scale at street level. High-quality public domain outcomes, landscaping and consistent design principles will ensure a welcoming, safe and attractive environment for residents, workers and visitors.</li> </ul>
<b>Connecting with Country</b>	<p>The <i>Connecting with Country</i> framework is essential in maintaining and protecting Aboriginal heritage and uniting Aboriginal and non-Aboriginal people to work together in project development. In alignment with international and domestic laws and policies, the framework aims to remedy the continuous impacts of colonisation and provide a voice to Aboriginal people in development.</p> <p>The framework encourages reliance on local Aboriginal knowledge of Country to preserve and care for the land, along with supporting the local Aboriginal community. Community consultation with local Aboriginal people has informed the design of this proposed development, with key design elements incorporating and reflecting the local Aboriginal history, ecology and cultural values. The concept proposal has been underpinned by a Connecting with Country framework which is outlined in <b>Sections 6.2.4</b> and <b>Section 9.1</b> of the EIS and within the Designing with Country Report attached at <b>Appendix I</b>.</p>
<b>Draft Sydney Plan</b>	<p>The draft Sydney Plan is the New South Wales Government's strategic land-use plan for the Sydney region, designed to guide growth over the next 20 years. It sets the framework for how the region will manage population growth, housing supply, infrastructure investment, jobs, sustainability and liveability across 33 local government areas. The draft Sydney Plan is intended to replace the existing Greater Sydney Region Plan – A Metropolis of Three Cities (2018) and associated district plans once finalised.</p> <p>The draft Sydney Plan has developed the following priorities which will inform local strategic planning and assessment processes, infrastructure planning and prioritisation of public and private investment decisions. The concept SSDA and its alignment with these priorities are outlined below:</p> <ul style="list-style-type: none"> <li>• <b>Aboriginal outcomes:</b> The draft Sydney Plan recognises that Country is central to Aboriginal peoples' identity and sense of belonging. Waterloo South has a significant First Nations community with enduring cultural connections to the land. The concept SSDA has been informed by engagement with Aboriginal communities and establishes a framework for a future precinct that embeds Country within the urban design, landscape and public domain from the outset. The concept proposal also makes provision for dedicated homes for first nation tenants. Of the social housing GFA, 20% of this GFA will be prioritised for Aboriginal tenants. Of the affordable housing provision which equates to approximately 20% of the overall residential GFA, 15% of this GFA will be prioritised for Aboriginal tenants. This confirms the ongoing commitment that existing residents of Waterloo South will be provided with the opportunity to return to the precinct following redevelopment.</li> <li>• <b>Housed:</b> The concept SSDA responds directly to the need to increase housing supply in a highly accessible inner-city location. The proposal establishes the framework for the delivery of approximately 3,300 new dwellings and supports the draft Sydney Plan's objectives for increased housing diversity and choice. The concept SSDA includes a mix of housing tenures, with a minimum 30% provided as social housing, a maximum 50% as market housing and the balance of affordable housing. A minimum 7% of residential floor space will be delivered as affordable housing owned and managed by City West Housing in perpetuity. Any additional affordable housing above the minimum 7% will be provided for a minimum of 25 years. Community facilities</li> </ul>

and non-residential uses are integrated within the concept to support a growing residential population and create a complete and functional precinct.

- **Prosperous:** The concept SSDA facilitates a residential-led, mixed-use precinct that co-locates housing with employment-generating uses. This approach supports economic activity and aligns with the draft Sydney Plan's objective to deliver productive places that integrate living, working and services within well-located urban areas.
- **Connected:** The draft Sydney Plan emphasises compact, transport-oriented development supported by public transport, walking and cycling networks. The concept SSDA is strategically aligned with this direction, establishing a mixed-use precinct with strong connectivity to public transport, including the nearby Waterloo metro station. The concept design promotes improved permeability, enhanced pedestrian connections, increased solar access to the public domain and activated street frontages, creating a highly walkable and legible precinct.
- **Resilient:** The concept SSDA establishes building envelopes and public domain outcomes that support improved environmental performance. The proposal provides opportunities for increased tree canopy coverage from the existing condition, high-quality public open spaces and integrated landscape outcomes that will assist in mitigating urban heat island effects, improving biodiversity and enhancing overall environmental resilience.
- **Liveable:** The redevelopment of Waterloo South is underpinned by principles of inclusivity, safety and a strong sense of place. The concept SSDA supports these outcomes by facilitating a diverse mix of housing tenures, activated street edges, accessible community facilities and new high-quality public open spaces. The proposal provides a robust framework to guide future detailed design stages and ensure high-quality built form and public domain outcomes.
- **Coordinated:** The draft Sydney Plan emphasises the importance of coordinating growth with infrastructure delivery. Waterloo South is located within an established urban area and benefits from existing infrastructure, including the Waterloo metro station. The concept SSDA ensures that future development is supported by strong public transport connectivity and can be delivered in an orderly and coordinated manner, without placing unreasonable demands on existing infrastructure.

In accordance with the above, the concept SSDA aligns with the key priorities of the draft Sydney Plan. The detailed implications of the draft Sydney Plan will be further considered and refined at subsequent detailed SSDA stages.

## 4.2 Cumulative Impacts

As detailed within this EIS, potential cumulative impacts from nearby developments have been considered, with no significant environmental issues identified that cannot be appropriately managed or mitigated. A review of other significant developments currently being undertaken or planned in the vicinity of the site has identified the project outlined in **Table 5**. The environmental assessment in **Section 9.0** considers the cumulative impacts associated with these projects.

## 4.3 Planning Agreements

The VPA requires the following public benefits to be provided within the Waterloo South Precinct Area:

### Delivery of Open Space

- The embellishment of approximately 23,600m<sup>2</sup> of land is required for the delivery of public open space (includes road closure area owned by the City of Sydney within the location of the proposed new large park).
- Two parks are required to be delivered on the site. One large park of no less than 20,000m<sup>2</sup> in area and one neighbourhood park of no less than 1,000m<sup>2</sup> in area is to be provided.
- Approximately 21,000m<sup>2</sup> of land is to be dedicated to the City of Sydney for the purposes of public open space.

### Delivery of Roads/Essential Infrastructure

- Existing roads and road reserves on the site are to be embellished, and new roads are to be provided at Cooper Street, West Street and Pitt Street, as identified in the Land Dedication Plan contained within the Design Guide.

## **Delivery of Community Facilities**

- Approximately 2,400m<sup>2</sup> for the purpose of multi-purpose community facilities across no more than two (2) locations on the land is to be provided, which may include a multipurpose space, meeting rooms, library link, recreational space and creative spaces subject to agreement by the City of Sydney.

The concept SSDA facilitates the delivery of these public benefits through the establishment of the land use distribution, building envelopes, and distribution of development, public domain outcomes, and infrastructure delivery parameters which will inform the future detailed applications. The VPA will ensure that the public benefits are delivered in a timely manner with the proposed development of the land.

## **4.4 Analysis of Alternatives**

In accordance with the EP&A Act 1979 and the project-specific SEARs, this section outlines the reasonable alternatives considered for the redevelopment of Waterloo South and explains the basis for selection of the preferred option.

Stockland, in collaboration with the project's design team and in consultation with Homes NSW and the relevant stakeholders, has undertaken extensive investigations into alternative redevelopment scenarios. These investigations were informed by strategic planning objectives, detailed design testing, feasibility analysis, housing policy requirements and the long-term operational needs of social and affordable housing delivery.

### **4.4.1 Option 1 – Do Nothing**

The 'Do Nothing' option would involve retaining the site in its current condition, with no redevelopment or reinvestment in the existing housing stock or supporting infrastructure.

The existing buildings within Waterloo South are largely end-of-life assets that no longer meet contemporary standards for safety, accessibility, sustainability or residential amenity. Many dwellings are inefficient in layout, costly to maintain and unsuitable for long-term occupation, particularly for ageing residents and those with accessibility needs.

Under this option, the site would remain significantly under-utilised despite its high level of accessibility, proximity to public transport, services and employment opportunities. The failure to redevelop would represent a missed opportunity to optimise the use of a large government-owned site in a strategic inner-city location.

In addition, doing nothing would not deliver on State and National Government housing priorities, including commitments under the National Housing Accord to increase housing supply and expand the provision of social and affordable housing. The option would also fail to address the growing demand for community, health and support services within the area.

The 'Do Nothing' option was therefore discounted as it does not achieve acceptable social, economic or planning outcomes.

### **4.4.2 Option 2 – Redevelop the existing housing stock**

This option considered refurbishment and partial redevelopment of the existing buildings to improve amenity and extend their operational life.

Detailed investigations identified significant limitations to this approach. The existing built form does not readily accommodate contemporary dwelling standards, universal design requirements or efficient servicing arrangements required by CHPs. Structural constraints and inefficient floorplates would limit opportunities to meaningfully improve accessibility, sustainability and residential amenity.

Importantly, this option would significantly constrain the ability to increase housing yield and diversify dwelling types. It would not enable the delivery of the scale of housing required to meet strategic objectives. Opportunities to deliver new community facilities, public open space and improved pedestrian connectivity would also be limited.

Accordingly, this option was not considered capable of delivering a transformational or long-term outcome for the precinct or Sydney.

#### **4.4.3 Option 3 – Development under existing planning controls**

This option considers redevelopment of Waterloo South in accordance with the existing planning framework established under the Sydney LEP 2012 and the 2022 Design Guide, without any amendment to the current height, floor space or related development standards.

A detailed review of the existing controls and the 2022 Design Guide has identified material inconsistencies between the Height of Buildings Map under Sydney LEP 2012 and the building envelopes envisaged by the 2022 Design Guide. While the 2022 Design Guide establishes intended massing outcomes for the precinct, the statutory height controls do not consistently align with those envelopes. As a result, a development that strictly complies with both the 2022 Design Guide and the LEP height standards is unable to physically accommodate the full quantum of floor space permitted under the LEP, including the design excellence bonus.

Detailed design testing has demonstrated that, under the existing controls, there would be an estimated shortfall of approximately 20,000 square metres of gross floor area compared to the permissible development capacity. This shortfall would materially reduce the overall development yield and directly constrain the ability of the precinct to achieve its intended contribution to housing supply. In particular, it would reduce the opportunity to deliver additional social and affordable housing supply, undermining the NSW Government's commitment to achieving a minimum 50 per cent of residential GFA as social and affordable housing within the precinct.

In addition to yield impacts, the misalignment between the statutory controls and the 2022 Design Guide introduces uncertainty and inefficiency into the planning and assessment process. Future development stages would likely be required to rely on repeated clause 4.6 variations to reconcile height non-compliances in order to deliver the intended built form outcomes. This approach would reduce planning certainty, increase assessment complexity and risk inconsistent outcomes across stages of the redevelopment.

Further design testing undertaken as part of the preparation of this concept SSDA has also identified opportunities to refine building envelopes and massing arrangements to achieve superior design outcomes, including improved residential amenity, better interface conditions with streets and open spaces, and enhanced public domain quality. These improvements cannot be fully realised under the existing controls due to their internal inconsistencies and rigidity.

For these reasons, redevelopment under the existing Sydney LEP 2012 and 2022 Design Guide controls was not considered to represent a reasonable or optimal alternative. Retention of the current framework would result in a poorer planning outcome by constraining housing delivery, particularly social and affordable housing, reducing design quality and perpetuating reliance on site-specific planning variations.

#### **4.4.4 Option 4 – Proposed Scheme**

The proposed scheme is progressed through a concept SSDA and represents the preferred development option for the redevelopment of Waterloo South. The concept SSDA establishes the strategic development framework that will guide the future staged redevelopment of the precinct, while a concurrent Rezoning Proposal seeks to align the statutory planning controls with the development parameters tested through this application.

The concept SSDA seeks consent for the key development principles and parameters that are appropriately determined at a concept stage, including land uses, maximum building envelopes, distribution of GFA, indicative subdivision and access arrangements, staging principles and a suite of management strategies. These parameters define the overall form, structure and functional relationships across the precinct and will inform the preparation and assessment of future detailed SSDAs. Detailed building design, final layouts and architectural resolution will be addressed at subsequent stages.

The concurrent Rezoning Proposal seeks to amend the Sydney LEP 2012 and the 2022 Design Guide to ensure that statutory development standards operate cohesively with the intended building envelopes established through the concept SSDA. This alignment resolves the inconsistencies identified under the existing controls, where development that strictly complies with both the 2022 Design Guide and the current height standards would be unable to physically accommodate the full permissible GFA, including design excellence bonus floor space. Retention of the existing controls would therefore result in a material shortfall in achievable development capacity, directly constraining the delivery of housing, particularly social and affordable housing.

By aligning statutory controls with the tested and approved building envelopes, the proposed scheme enables delivery of the intended development capacity in a manner that is physically achievable, coherent and responsive to the site context. Importantly, this approach avoids the need for ongoing reliance on clause 4.6 variations at future development stages, improving planning certainty, reducing assessment complexity and supporting consistent outcomes across the life of the project.

The proposed scheme also enables a coordinated, precinct-wide approach to land use distribution, access, public domain delivery, infrastructure provision and staging and supports the delivery of superior long-term outcomes in terms of public space quality, residential amenity, servicing efficiency and overall precinct functionality. Design testing undertaken as part of the concept approval and rezoning processes has demonstrated that the proposed scheme allows for refinements to building envelopes and massing that improve solar access, wind conditions, street interfaces and residential amenity, outcomes that would not be achievable under the existing control regime.

The proposed scheme facilitates delivery of over approximately 3,300 new dwellings, with a minimum 30 per cent of residential GFA allocated to social housing and approximately 20 per cent as affordable housing, alongside community facilities, childcare, health services and publicly accessible open space. The concept approval pathway provides early confirmation of development capacity and key urban design outcomes while retaining flexibility to respond to detailed design development, staging requirements and operational considerations at subsequent stages.

Overall, the proposed scheme represents a balanced, efficient and deliverable planning outcome. It provides a clear and integrated framework that aligns statutory controls, concept approval parameters and design guidance, maximises the delivery of social and affordable housing, and supports the timely and coordinated redevelopment of Waterloo South in accordance with State and National policy objectives.

## 4.5 Project Justification

In consideration of the site's strategic context and the analysis of alternative options available, the current proposal is the most appropriate to achieve the objectives of the project. This is because the proposed development:

- Is permissible with consent and demonstrates consistency with the relevant statutory and strategic planning framework, including the Sydney Local Environmental Plan 2012 (as proposed to be amended), State and Commonwealth housing policy, and urban renewal objectives for well-located inner-city precincts.
- Establishes a comprehensive planning framework for the long-term staged redevelopment of Waterloo South, including building envelopes, land use distribution, infrastructure delivery, public domain outcomes and precinct-wide strategies to guide future detailed applications.
- Will deliver approximately 3,300 new dwellings, including a substantial proportion of social and affordable housing, directly contributing to State and national housing supply targets and supporting delivery of diverse and inclusive housing in an accessible location.
- The proposal will create a mixed-use precinct supported by community uses which could include health and education uses, retail and non residential uses, and high-quality publicly accessible open space, significantly improving liveability and amenity for existing and future residents.
- Extensive engagement with government agencies, Aboriginal stakeholders, tenants and the broader community has informed the design development, ensuring responsiveness to community priorities including tenure-blind housing, connectivity, open space provision and cultural recognition.
- The technical assessments undertaken at concept SSDA stage, have assessed the potential impacts associated with the development. These assessments have not identified any adverse environmental impacts beyond which can be resolved through detailed development application stages and through the implementation of mitigation measures.
- The proposal will generate substantial social and economic benefits, including employment during construction and operation, renewal of ageing social housing, improved access to services and infrastructure, and activation of the local economy.
- The development is consistent with the principles of ecologically sustainable development, incorporating sustainability initiatives, biodiversity enhancement, resource efficiency and long-term environmental management.
- The site is highly suitable for redevelopment given its proximity to high-capacity public transport, existing infrastructure, services, employment opportunities and its capacity to support a coordinated master-planned renewal of underutilised government land.

Accordingly, the proposed concept development is considered strategically justified, environmentally acceptable, socially beneficial and in the public interest, and approval of the application is warranted. Refer to **Section 10.0** of this EIS for a detailed justification of the proposed development.

# 5.0 The Proposed Rezoning

## 5.1 Project Objectives and Intended Outcomes

A concurrent Rezoning Proposal is proposed to underpin the concept SSDA, which seeks targeted amendments to the Sydney LEP 2012 and the Waterloo Estate (South) Design Guide 2022 to ensure building height, floor space and related development standards align with the intended building envelopes for Waterloo South. The Rezoning Proposal is attached in full at **Appendix KK**.

The Rezoning Proposal aims to harmonise the LEP development standards and the Design Guide so they operate cohesively and can deliver the intended built form without ongoing reliance on clause 4.6 variations at future stages. This is intended to streamline assessment of subsequent detailed applications, provide greater certainty for delivery, and reduce the risk of delays to the project.

### Amendments to the Sydney LEP 2012

The following changes are proposed to the Sydney LEP 2012 to achieve alignment with the proposed Design Guide updates and support the built form proposed in the concurrent concept SSDA:

- Amend the Height of Buildings and FSR maps to reflect the revised building envelopes and enable the currently permissible GFA to be accommodated within the intended massing.
- Amend clause 7.27 to permit 'educational establishments' and 'creative industries' as allowable land uses along designated active frontages and amend the Active Frontage maps to reflect the revised building envelopes.
- Amend clause 7.29(3)(a) to reduce the minimum non-residential GFA requirement for Waterloo South from 17,000m<sup>2</sup> to 15,000m<sup>2</sup>.
- Amend clause 7.29(3)(b) to include 'educational establishment' as an additional land use that may contribute to the minimum 5,000m<sup>2</sup> requirement under this clause.
- Delete clause 7.29(4) as the maximum GFA for the precinct, inclusive of the design excellence bonus has been captured in the amended Height of Buildings and FSR maps.
- Amend clause 7.29(5) to reference a revised publication date of the Design Guide.
- Amend clause 7.29(6) to allow rooftop access to communal open space and related amenity structures to extend beyond the height of building measurement.
- Amend clause 7.29(7) to state that clause 6.21D(3)(b) of the Sydney LEP 2012 which permits additional FSR for the achievement of design excellence does not apply to development on the site.
- Renumber clause 7.29(8) to 7.29(9) and replace 7.29(8) with a clause that clarifies that the City of Sydney affordable housing program doesn't apply to Waterloo Estate (South) – Area 1.

### Amendments to the Waterloo Estate (South) Design Guide 2022

Amendments are also proposed to the 2022 Design Guide to ensure alignment with the planning framework under the Sydney LEP 2012 and to reflect the proposed concept SSDA. the proposed amendments:

- Respond to the need to align the Design Guide building envelopes with amended LEP height and floor space controls;
- Enhance the public domain, ground-level amenity, and environmental performance;
- Accommodate an updated tenure mix and maximise the delivery of social and affordable housing within the permissible floor space;
- Embed a strengthened approach to Designing with Country informed by engagement with the local Aboriginal community; and
- Improve development efficiency and feasibility through supporting more standardised residential typologies.

Collectively these amendments will rationalise the Sydney LEP 2012 provisions with the provisions of the proposed Design Guide updates, facilitate delivery of the concept SSDA, and ensure the maximum development capacity is achievable within the statutory framework to support delivery of the intended social, affordable, and market housing proportions.

# 6.0 The Proposed Development

Pursuant to Division 4.7 of the EP&A Act, Stockland and NSW LAHC seek development consent for a concept proposal that will facilitate the future redevelopment of the site as a mixed-tenure housing precinct and deliver much needed housing in response to National and State Government priorities.

## 6.1 Project Summary

The concept SSDA seeks approval for a comprehensive redevelopment framework for the NSW LAHC owned properties within Waterloo South. The concept proposal establishes the overarching land use, built form, public domain and infrastructure parameters that will guide future detailed development applications.

The concept SSDA does not seek consent for any physical works to occur on the site, as this will be determined in separate planning applications. All physical works will be the subject of future detailed applications, to be lodged following the submission of this concept SSDA and assessed having regard to the parameters established by the concept SSDA development consent once granted.

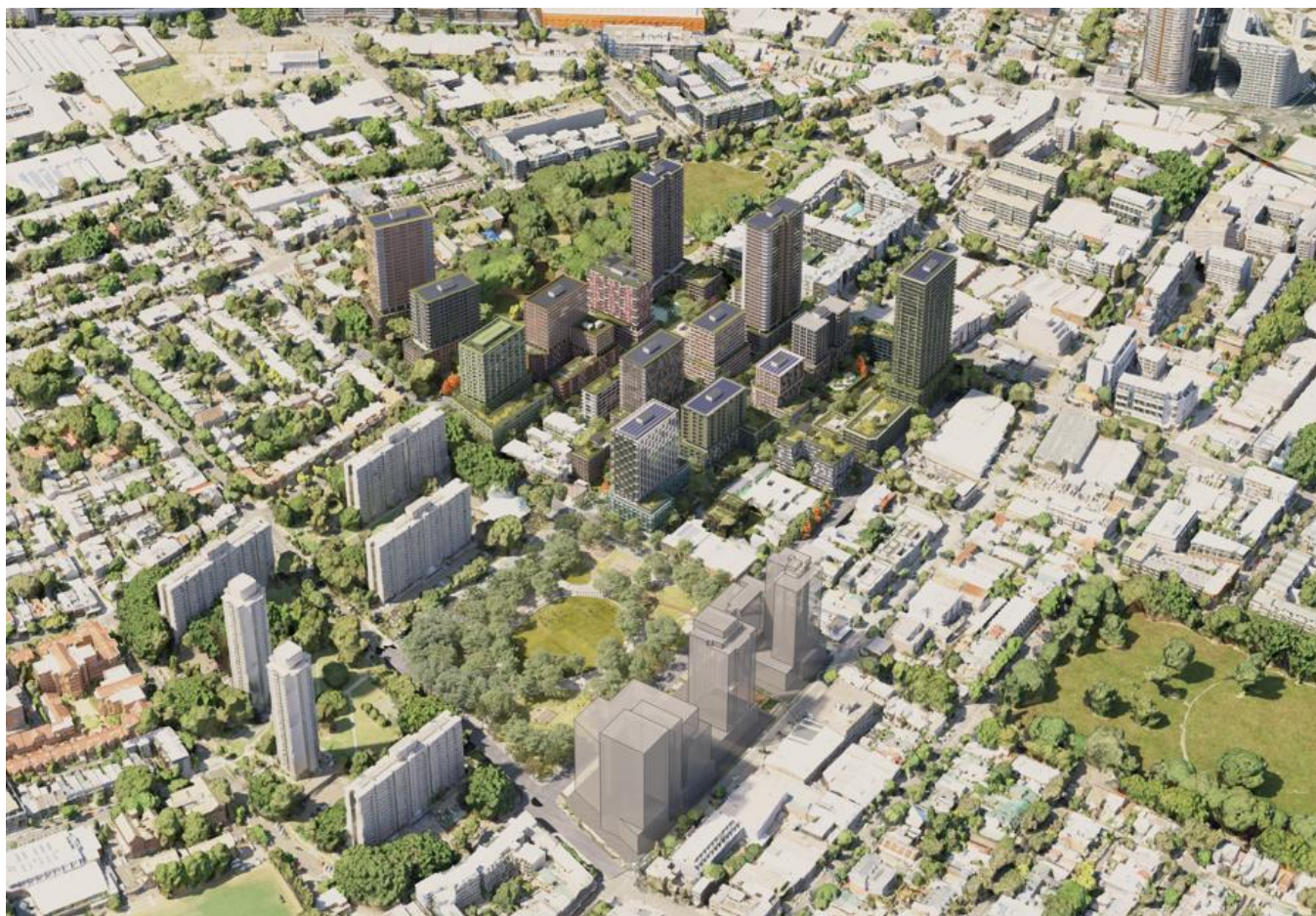
Specifically, the concept SSDA seeks consent for the following development parameters across the Waterloo South precinct:

- Maximum building envelopes, including maximum building heights, street-wall heights and setbacks.
- Distribution of gross floor area across the Waterloo South precinct development blocks.
- Indicative allocation of floor space between social, affordable and market housing, as well as non-residential and community uses across the Waterloo South Precinct Area.
- Loading, vehicular, pedestrian, and active transport access arrangements.
- Public domain upgrades and new public domain and publicly accessible areas.
- Indicative subdivision plan, staging plan and delivery sequencing for development.
- Several precinct-wide management plans and strategies to inform future stages of the development, including:
  - Updated Design Excellence Strategy
  - Design with Country Strategy
  - Preliminary Public Art Strategy
  - Contamination Strategy
  - Flood Management Strategy
  - Stormwater Management and Drainage Strategy
  - Ecologically Sustainable Development (ESD) Strategy
  - Utilities and Services Strategy, including service infrastructure lead-in and enabling works
  - Tree Retention Strategy

Subdivision approval is not sought under this concept SSDA. Subdivision will be sought within subsequent detailed applications, and will include (but not necessarily limited to):

- subdivision for the creation of development lots
- strata and stratum subdivision of any basement levels
- strata subdivision of market housing buildings
- stratum subdivision for mixed use buildings

A draft subdivision plan is attached at **Appendix H**. Architectural Plans prepared by SJB illustrating the proposed development are included at **Appendix F** and **Appendix JJ**. An artist impression of the proposed development is shown at **Figure 29**. A summary of the key development metrics proposed is provided at **Section 6.2** and a detailed description of the proposal is provided in the following sections of this report.



**Figure 29** Axonometric perspective of the reference scheme

Source: Design Report prepared by SJB

## 6.2 Concept Proposal

### 6.2.1 Proposal Overview

The following table provides the key development metrics of the concept SSDA, with further information provided in the subsequent sections of this report.

**Table 7** Summary of key development metrics

Component	Proposal	
<b>Site Area</b>	<ul style="list-style-type: none"> <li>Waterloo South has a developable site area of 114,822sqm / 11.5ha (as depicted in <b>Figure 31</b>)</li> <li>The broader Waterloo South Precinct Area, which includes all LAHC owned and privately owned properties and roads within the precinct, has a site area of 123,149sqm / 12.3ha.</li> </ul>	
<b>Proposed Land Uses</b>	<ul style="list-style-type: none"> <li>Residential:               <ul style="list-style-type: none"> <li>Social housing</li> <li>Affordable rental housing</li> <li>Market housing</li> </ul> </li> <li>Community uses which could include community facilities, childcare uses, health services and educational uses</li> <li>Non-residential uses to be determined in future detailed applications including but not limited to retail premises, commercial premises, business premises, light and creative industries, and recreational facilities</li> </ul>	
<b>Dwelling yield</b>	Approximately 3,300 dwellings	
<b>Maximum Gross Floor Area (GFA)</b>	<b>Total GFA (Maximum)</b>	282,484.64m <sup>2</sup>

Component	Proposal	
	Residential	<p>The proposed concept includes approximately 267,198m<sup>2</sup> of residential accommodation (approximately 3,300 dwellings), comprising:</p> <ul style="list-style-type: none"> <li>• A minimum 30% of residential GFA to be used for social housing.</li> <li>• A maximum of 50% of residential GFA to be used for 'market housing' / 'private housing'.</li> <li>• Approximately 20% of residential GFA to be used for affordable housing, representing the balance between the minimum social housing and the maximum market housing that is proposed, noting that at least 7% of residential GFA must be used for the purposes of affordable housing that is owned and managed by a community housing provider.</li> <li>• Any additional affordable housing provided over and above 7% of total residential floor space will be provided as affordable housing for a minimum period of 25 years.</li> </ul>
	Non-residential	<ul style="list-style-type: none"> <li>• A minimum 15,000m<sup>2</sup> non-residential land uses (inclusive of the 5,000m<sup>2</sup> referred to as 'community uses' below).</li> <li>• Reference scheme illustrates 15,305m<sup>2</sup> for non-residential uses.</li> </ul>
	'Community Uses'	<ul style="list-style-type: none"> <li>• Minimum 5,000m<sup>2</sup> which could comprise health services facilities, community facilities, centre based childcare facilities, and/or educational facilities.</li> <li>• Reference scheme illustrates 5,389m<sup>2</sup> for these 'community uses' within the total 15,305m<sup>2</sup> non-residential GFA.</li> </ul>
<b>Maximum Building Heights (storeys)</b>	Block 2	<ul style="list-style-type: none"> <li>• Building 2D – 9 storeys</li> <li>• Building 2B – 4 storeys</li> </ul>
	Block 3:	<ul style="list-style-type: none"> <li>• Building 3A – part 6 and 22 storeys</li> <li>• Building 3B – part 6 and 15 storeys</li> </ul>
	Block 4:	<ul style="list-style-type: none"> <li>• Building 4B – 8 storeys</li> <li>• Building 4C – part 8 and 21 storeys</li> </ul>
	Block 5:	<ul style="list-style-type: none"> <li>• Building 5A – part 6 and 18 storeys</li> </ul>
	Block 6:	<ul style="list-style-type: none"> <li>• Building 6A - part 6, 11 and 16 storeys</li> </ul>
	Block 7:	<ul style="list-style-type: none"> <li>• Building 7A – part 6 and 28 storeys</li> <li>• Building 7B – part 7 and 19 storeys</li> </ul>
	Block 8:	<ul style="list-style-type: none"> <li>• Building 8A - part 8, 15 and 33 storeys</li> <li>• Building 8B - part 3 and 6 storeys</li> <li>• Building 8C - part 3 and 10 storeys</li> <li>• Building 8D – 2 storeys</li> </ul>
	Block 9:	<ul style="list-style-type: none"> <li>• Building 9A – part 1, 9 and 33 storeys</li> <li>• Building 9B – part 1, 11 and 16 storeys</li> </ul>
	Block 10:	<ul style="list-style-type: none"> <li>• Building 10A - part 10 and 31 storeys</li> <li>• Building 10B - 17 storeys</li> </ul>
<b>Car Parking</b>	Approximately 1,500 spaces (across all land uses), excluding on-street car parking spaces, including 60 retail car parking spaces to be delivered on Block 9 to support the supermarket tenancy.	
<b>Public Open Space</b>	<p>The proposal will deliver the following public open spaces across the precinct:</p> <ul style="list-style-type: none"> <li>• The proposed development includes the Village Green Park comprising a minimum 20,000m<sup>2</sup> at Block 1 (site bound by George, Wellington, Cope and Raglan streets).</li> <li>• The proposed development includes a local park comprising a minimum 1,000m<sup>2</sup> at the centre of Block 8 bound by Cope, John, George and McEvoy streets.</li> </ul>	
<b>Tree Retention</b>	304 trees are proposed for retention.	
<b>Tree Removal</b>	236 trees will require removal to facilitate the proposed concept development.	

Component	Proposal
<b>Staging/ Phasing</b>	<p>The project is expected to occur in 7 stages.</p> <p>The 7 stages will consist of 6 built form stages and 1 stage specifically for the delivery of the large park which is required prior to the occupation of 50% of the total GFA. Staging is indicative and may be adjusted as the project progresses.</p>
<b>Estimated cost of development</b>	\$2,454,230,147 (incl. GST)

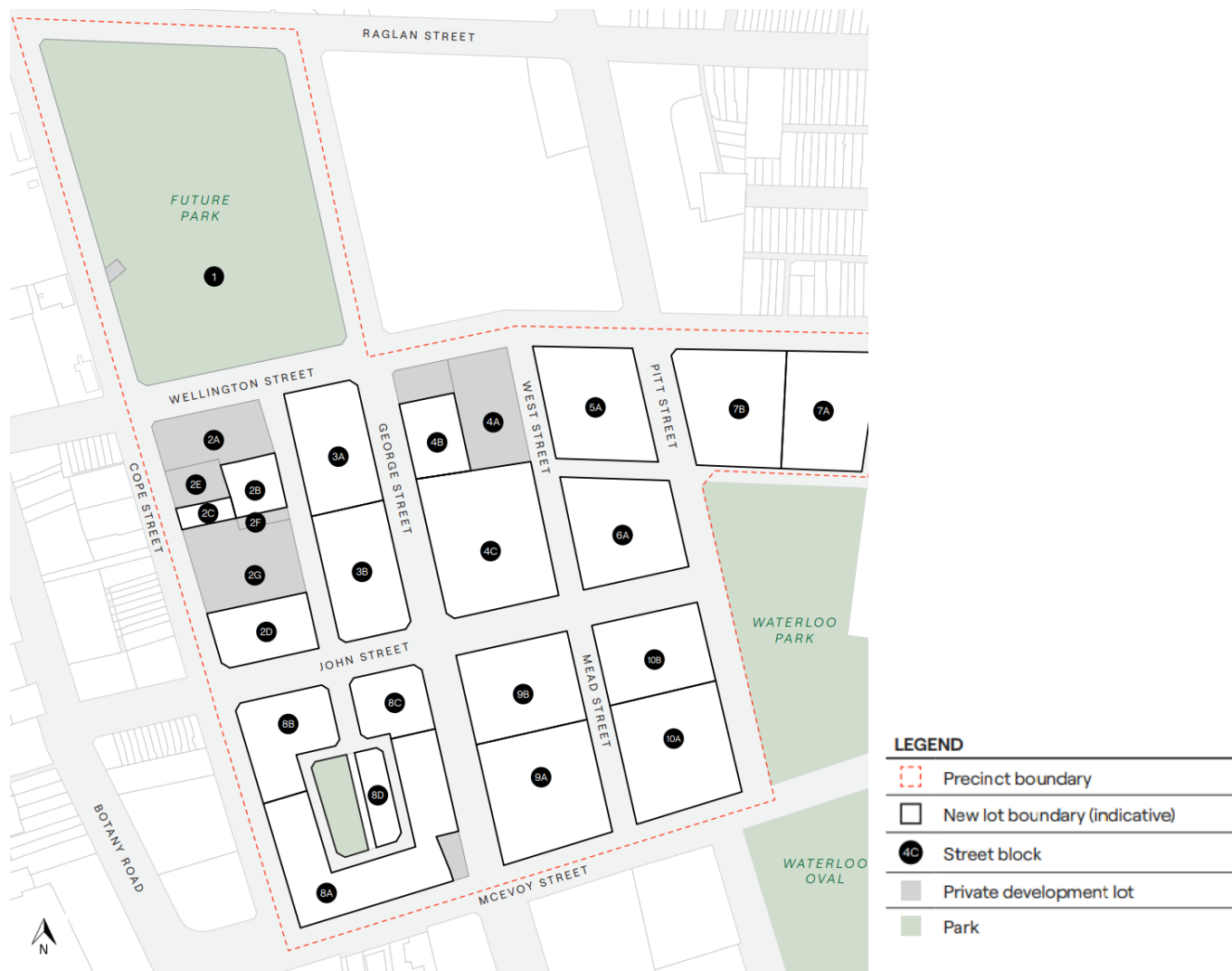
### 6.2.2 Project Area

As detailed in **Section 3.0**, the subject site forms part of the broader Waterloo Estate precinct. **Figure 27** illustrates the project site area (Waterloo South) in relation to the wider Waterloo Estate. The Waterloo South Precinct Area has a total site area of 123,149m<sup>2</sup>, encompassing all land within the Waterloo South boundary. The project site area, however, reflects only the developable lots within Waterloo South and excludes privately owned land, which do not form part of the development site. Accordingly, the project site area equates to 114,822m<sup>2</sup>.

The site has been defined into 10 development blocks to assist with the staging of the development as depicted in **Figure 30**. The proposed site layout and block alignment is depicted in **Figure 31**.



**Figure 30** Project site area within the broader Waterloo estate precinct and Waterloo South block breakdown  
 Source: Design Report prepared by SJB



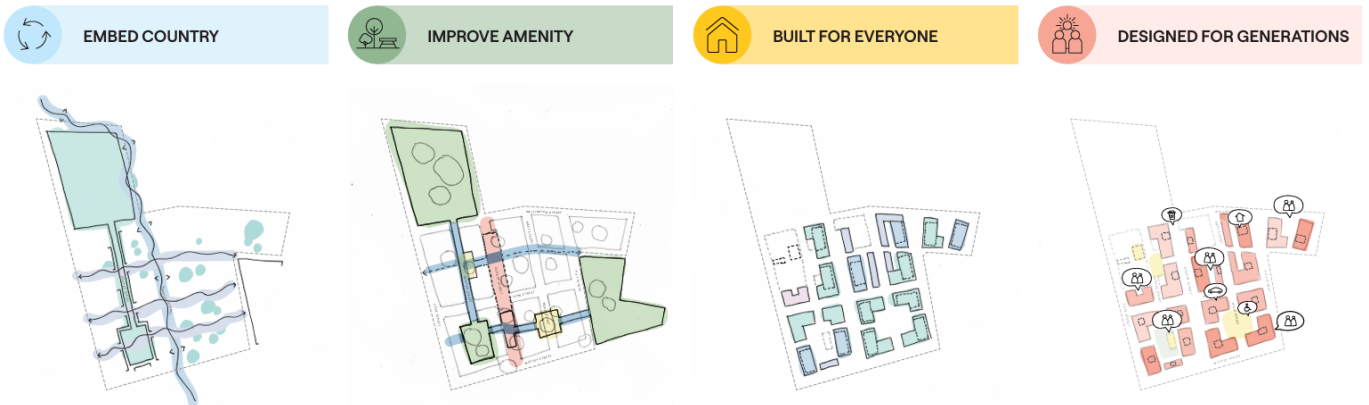
**Figure 31** Developable site area

Source: Revised Design Guide prepared by SJB

### 6.2.3 Design Principles

The concept SSDA has been informed by a series of design principles that form the foundation of the urban design strategy for Waterloo South. These principles support the project vision, the Designing with Country framework, and the Public Domain Strategy and have been developed collaboratively with Homes NSW and the broader specialist consultant team. The key principles include:

- **Embed Country:** embedding Country within the urban design, landscape and architecture of the precinct from inception, guided by the concepts of the Fold, Wet Country and Dry Country.
- **Improve amenity:** improving amenity for residents and visitors through access to sky, sun and high-quality public spaces, including reduced street wall heights relative to the 2022 Design Guide to support a consistent, human-scaled street environment.
- **Built for everyone:** with building typologies distributed across social, affordable and market housing to ensure equitable access to amenity and quality of living, and simplified typologies to support flexibility within approved envelopes.
- **Designed for generations:** the precinct is designed to meet the needs of both existing and future residents while fostering a strong sense of belonging. This is supported through well-considered day-to-day precinct operations, equitable access to views and amenity, and the coordinated provision of shared facilities and resources that support a range of household types and life stages



**Figure 32** Design principles  
 Source: Design Report prepared by SJB

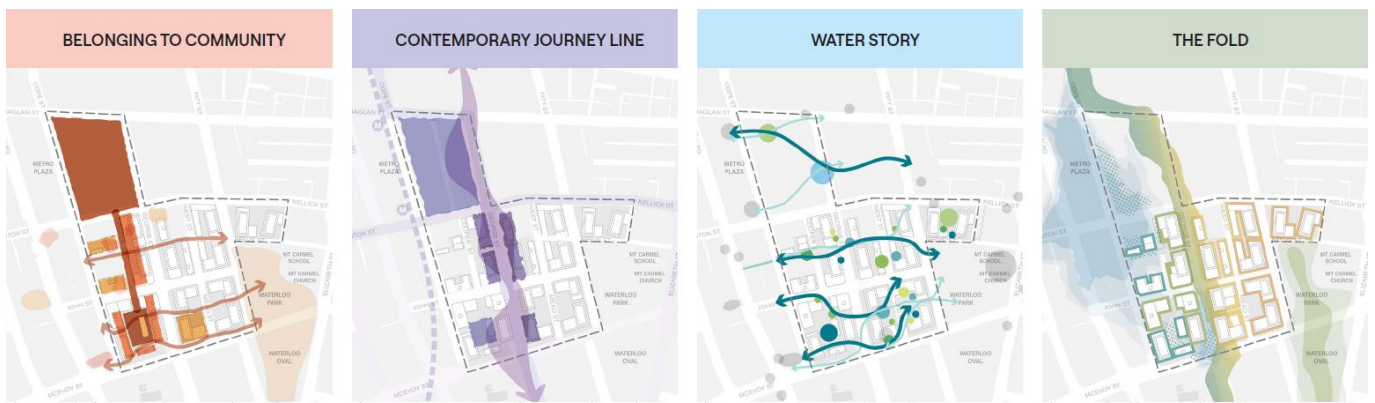
### 6.2.4 Designing with Country

The proposed concept plan is underpinned by the Designing with Country Framework prepared by Nguluway DesignInc through collaboration with Homes NSW, Stockland and the local Aboriginal community. The framework places Gadigal Country and culture at the centre of the renewal of Waterloo South and establishes guiding principles for development that is inclusive, sustainable and grounded in place (refer to **Figure 33**).

Drawing on place-based themes, Waterloo is recognised as a cultural and political heartland shaped by shared struggle, identity and resilience. The concept plan responds by embedding Aboriginal identity within the public domain, movement network and spatial structure of the precinct, strengthening a sense of belonging through everyday experiences of movement, gathering and occupation.

Key spatial moves informed by the Designing with Country Framework include a north–south songline along the western edge of the site, connecting Kamay (Botany Bay) and Warrane (Sydney Harbour). East–west connections draw inspiration from historic waterways, adopting more organic alignments that slow, curve and pool to create moments of pause and connection across the precinct.

These movements are further informed by the concept of “the fold”, which reflects Country continuing to express itself through contrasting conditions across the site. This is expressed through the transition from the wetter western lowlands to the drier eastern heights and informs the organisation of streets, public spaces, landscape character and built form across Waterloo South.



**Figure 33** Designing with Country Principles  
 Source: Urban Design Report prepared by SJB and informed by the Design with Country Framework prepared by Nguluway DesignInc.

## 6.2.5 Building Envelopes

The concept SSDA seeks consent for the maximum building envelopes across the site. The proposed building envelopes establish the upper limits of development, including maximum building heights, street wall heights, tower zones, minimum setbacks, and define the overall scale, massing and spatial relationships of development across the precinct. The proposed building envelopes are illustrated in **Figure 39 - Figure 45** and in **Appendix JJ**.

### Gross Floor Area

The concept SSDA seeks consent for a maximum GFA of 282,484.64m<sup>2</sup> across the site, consistent with the maximum FSR controls proposed under the concurrent rezoning of the Sydney LEP 2012, refer to **Section 7.3.5** of the EIS.

The building envelopes provide the spatial framework within which this floor space may be accommodated, while ensuring appropriate transitions to surrounding development, protection of public domain amenity and a coherent precinct structure.

### Building Typologies

To support adaptability across the staged delivery program, the concept envelopes adopt a limited number of standardised, envelope-responsive building typologies as depicted in **Figure 34**, including:

- Single loaded rectangular podium
- Double loaded L-shaped podium
- Double loaded rectangular podium
- Double loaded tower

Development is generally arranged in a perimeter block configuration, with defined street edges and publicly accessible internal courtyards. This arrangement reinforces an active public realm, supports passive surveillance and enables consistent building interfaces with streets, parks and public open spaces.



**Figure 34** Indicative building typologies

Source: Design Report prepared by SJB

## Building Height

The concept SSDA building envelopes seek consent for the building envelopes across the site, including the maximum building heights for each of the buildings across Blocks 2-10. The proposed maximum building heights across the site are outlined in **Table 7** and depicted in **Figure 35** and **Figure 39** to **Figure 45**.

The maximum building heights proposed are consistent with the maximum heights prescribed under the Sydney LEP 2012, as amended by the concurrent Rezoning Proposal, as outlined in **Section 6.2.6**.



**Figure 35** Waterloo south maximum storey height

Source: Design Guide prepared by SJB

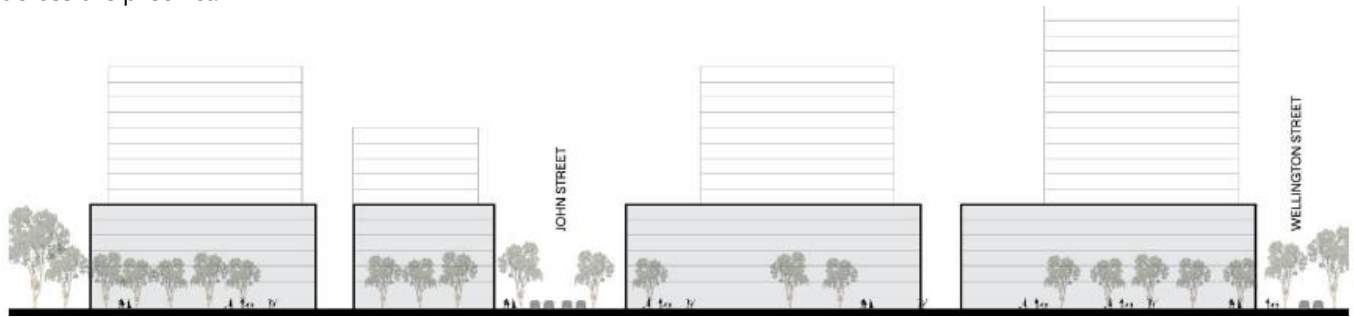
As outlined in **Figure 36**, building heights vary across the site in response to context, street hierarchy and adjacency to public open space. Taller envelopes are generally located toward the southern portion of the precinct, with mid-rise envelopes forming the predominant built form across much of the site and lower-scale envelopes reinforcing a human-scaled street environment along key interfaces. At Blocks 7-10 the maximum building height is defined by the PAN OPS (RL 126.4m).



**Figure 36** Proposed height distribution (viewed from northwest)

Source: Design Report prepared by SJB

Street wall heights are generally proposed to be up to six storeys (refer to **Figure 37**) to reinforce a human-scaled streetscape and maintain compatibility with the surrounding built context. This approach moderates the perceived bulk of development at street level, enhances pedestrian amenity and supports a consistent and legible built form character across the precinct.

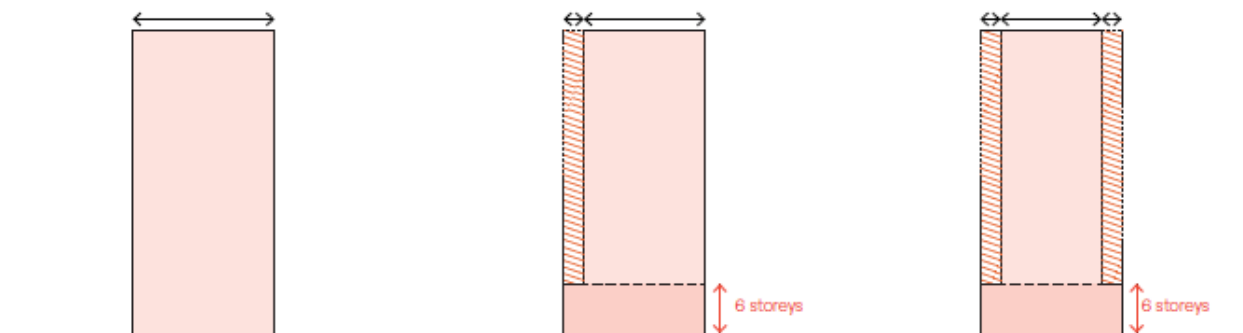


**Figure 37** Proposed consistent street wall

Source: Design Report prepared by SJB

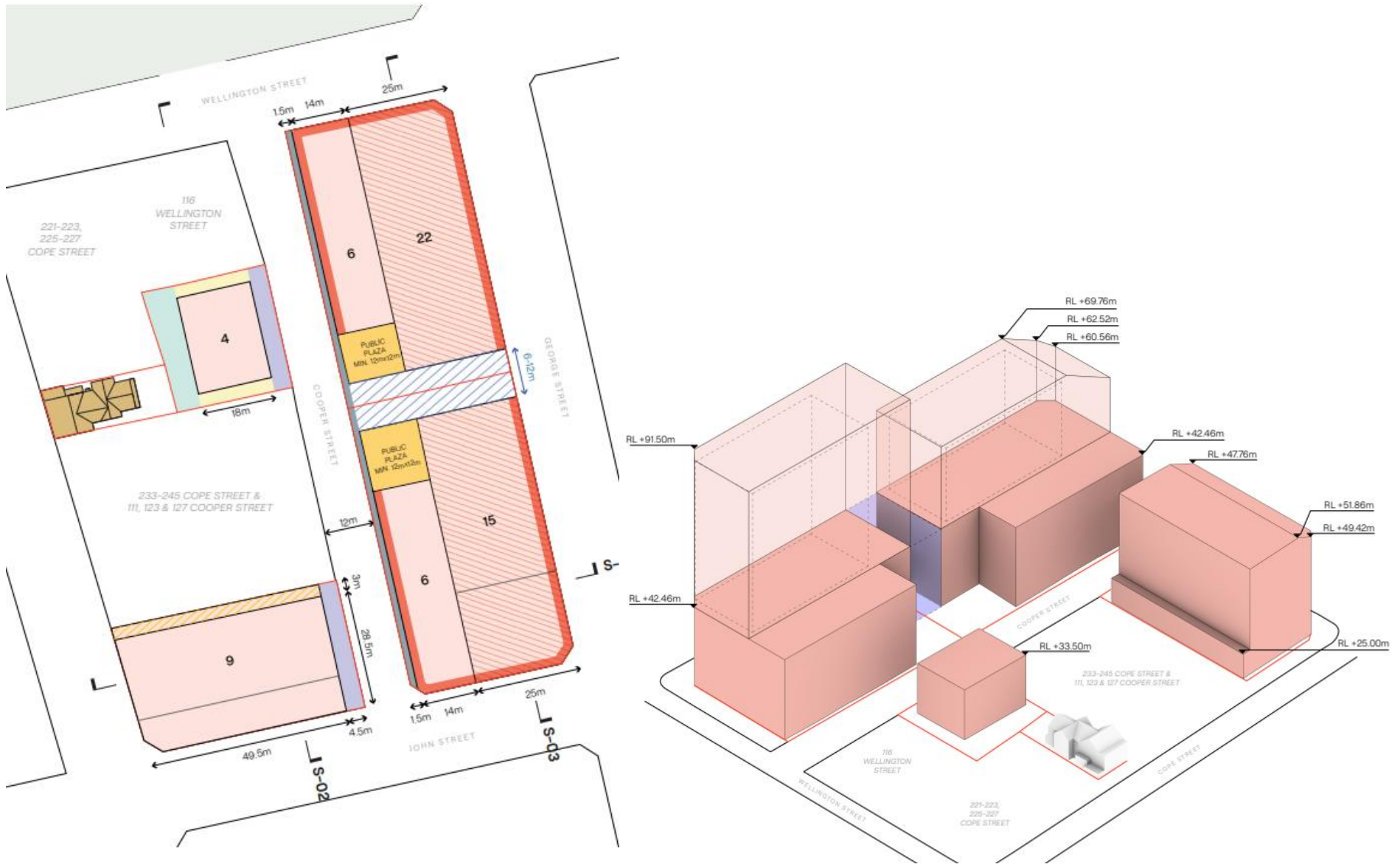
Above podium levels, tower envelopes define the maximum permissible horizontal extent of tower forms. These tower envelopes (refer to **Figure 38**), operate as an upper limit to control bulk and massing, maintain appropriate separation distances and support acceptable wind, solar access and skyline outcomes.

Tower floorplates are contained within the approved tower envelopes; however towers are not required to occupy the full extent of the envelope, and smaller or alternative configurations may be accommodated provided they remain within the approved limits. The reference scheme prepared by SJB, outlines one way the towers could sit within the maximum building envelopes.



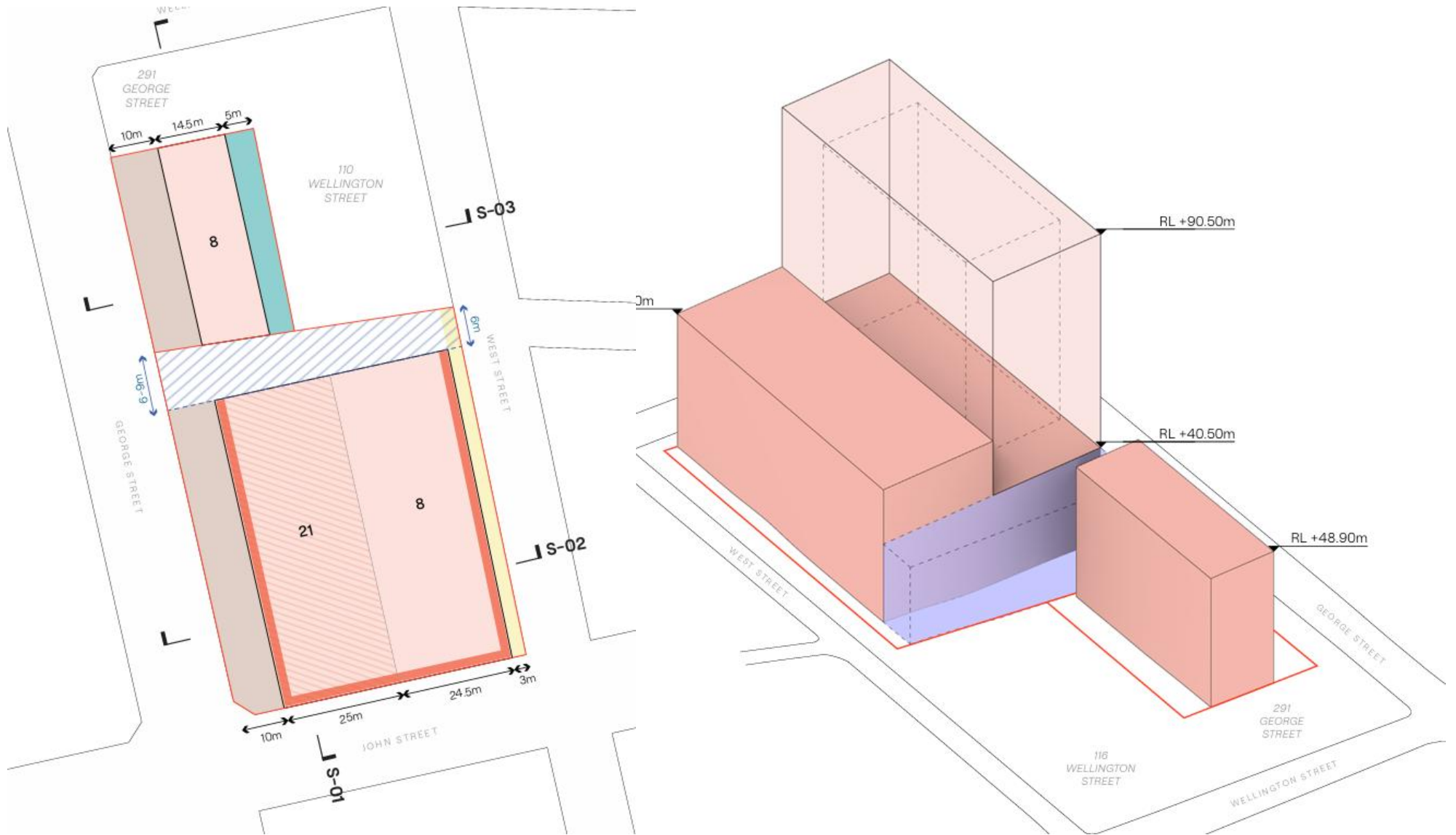
**Figure 38** Maximum tower dimensions

Source: SJB



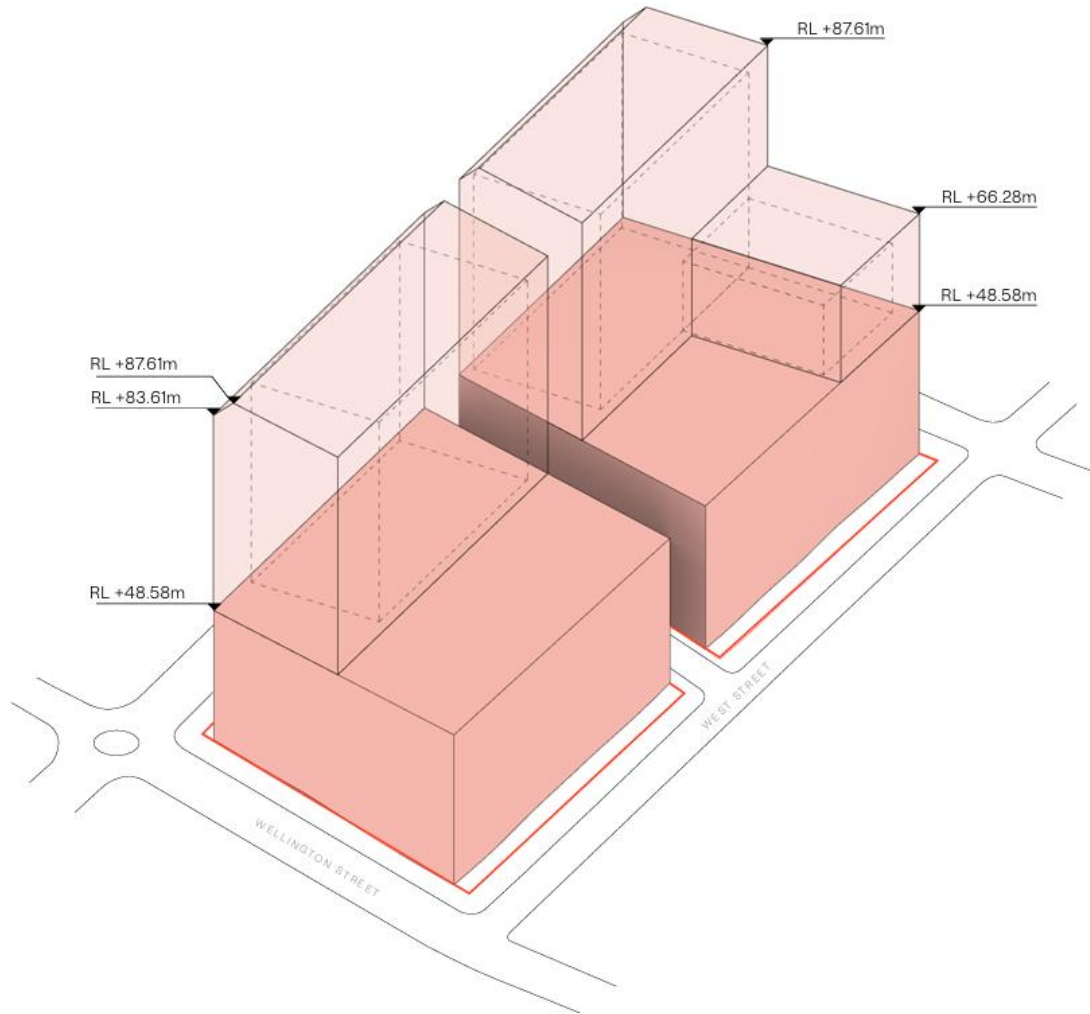
**Figure 39** Blocks 2 & 3 maximum storey height and envelope diagram

Source: Concept Envelope Plans prepared by SJB



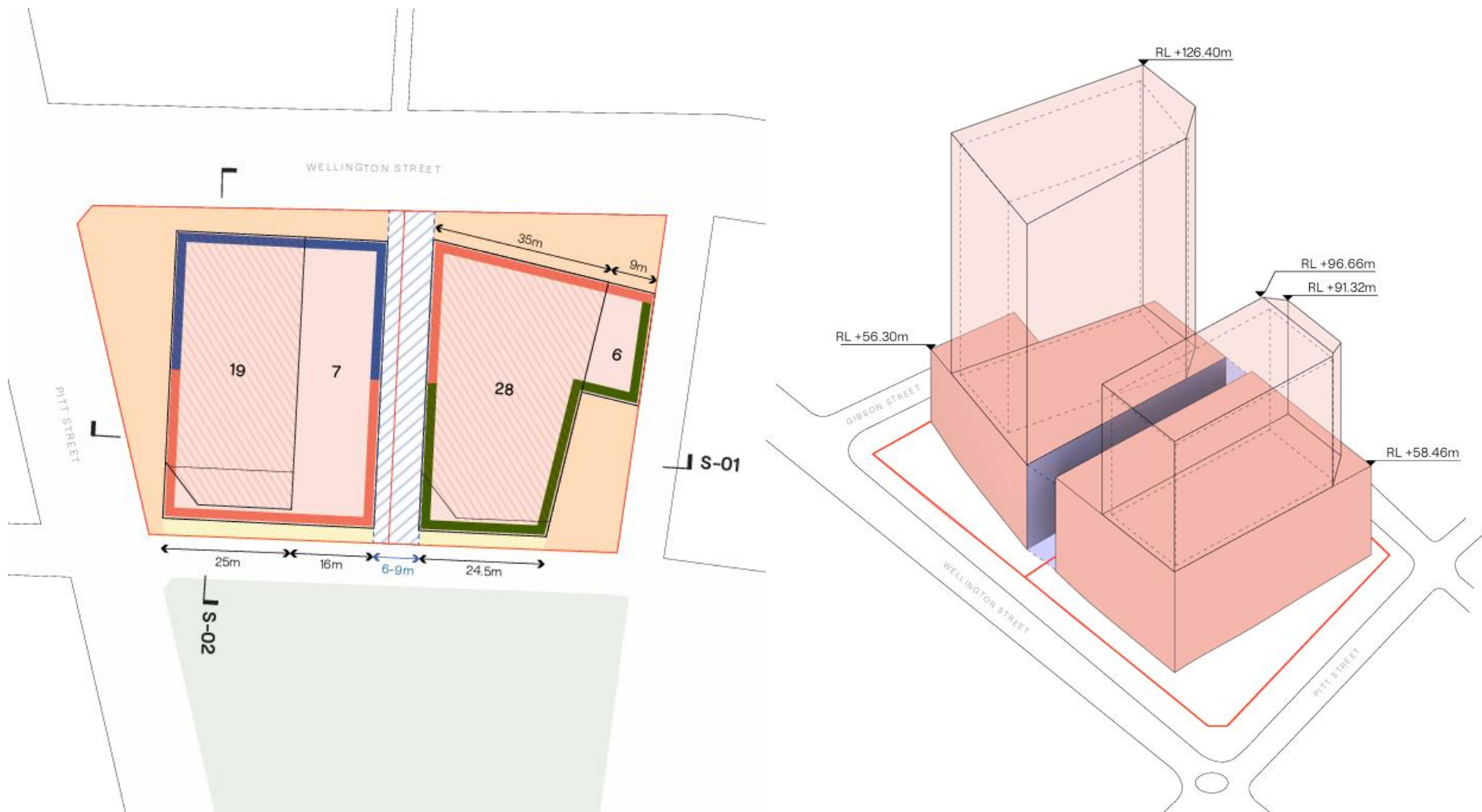
**Figure 40** Block 4 maximum storey height and building envelope diagram

Source: Concept Envelope Plans prepared by SJB



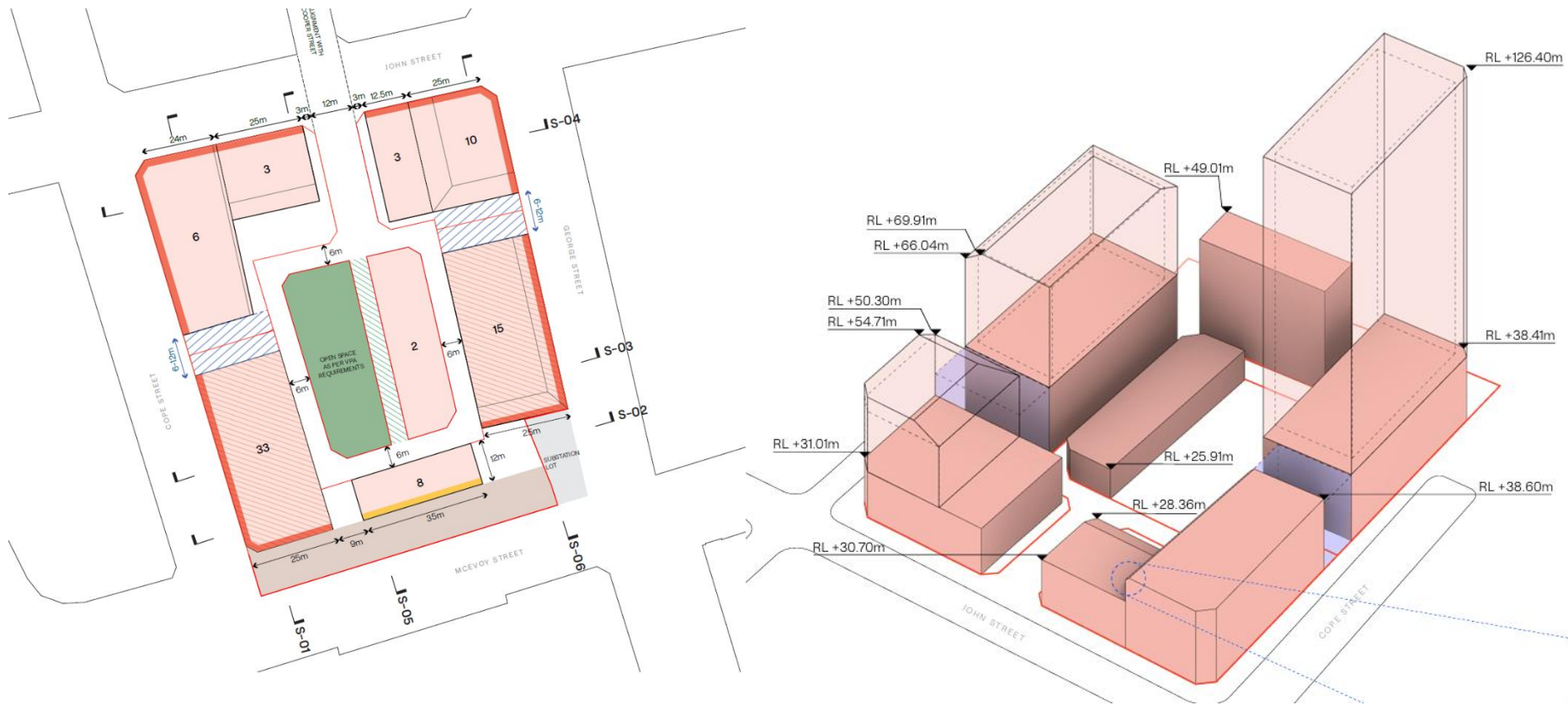
**Figure 41** Blocks 5 & 6 maximum storey height and envelope diagrams

Source: Concept Envelope Plans prepared by SJB



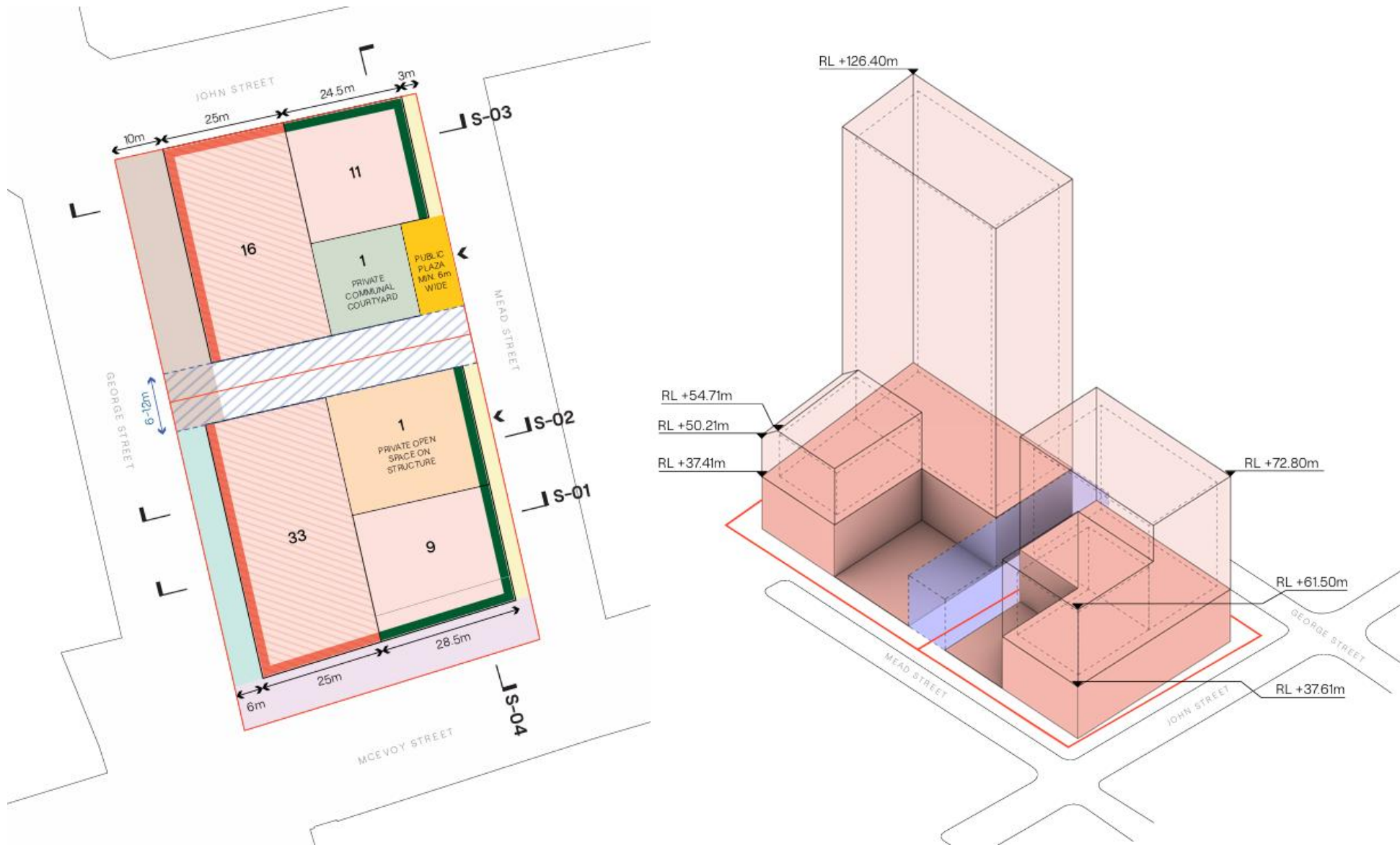
**Figure 42** Block 7 maximum storey height and envelope diagrams

Source: Concept Envelope Plans prepared by SJB



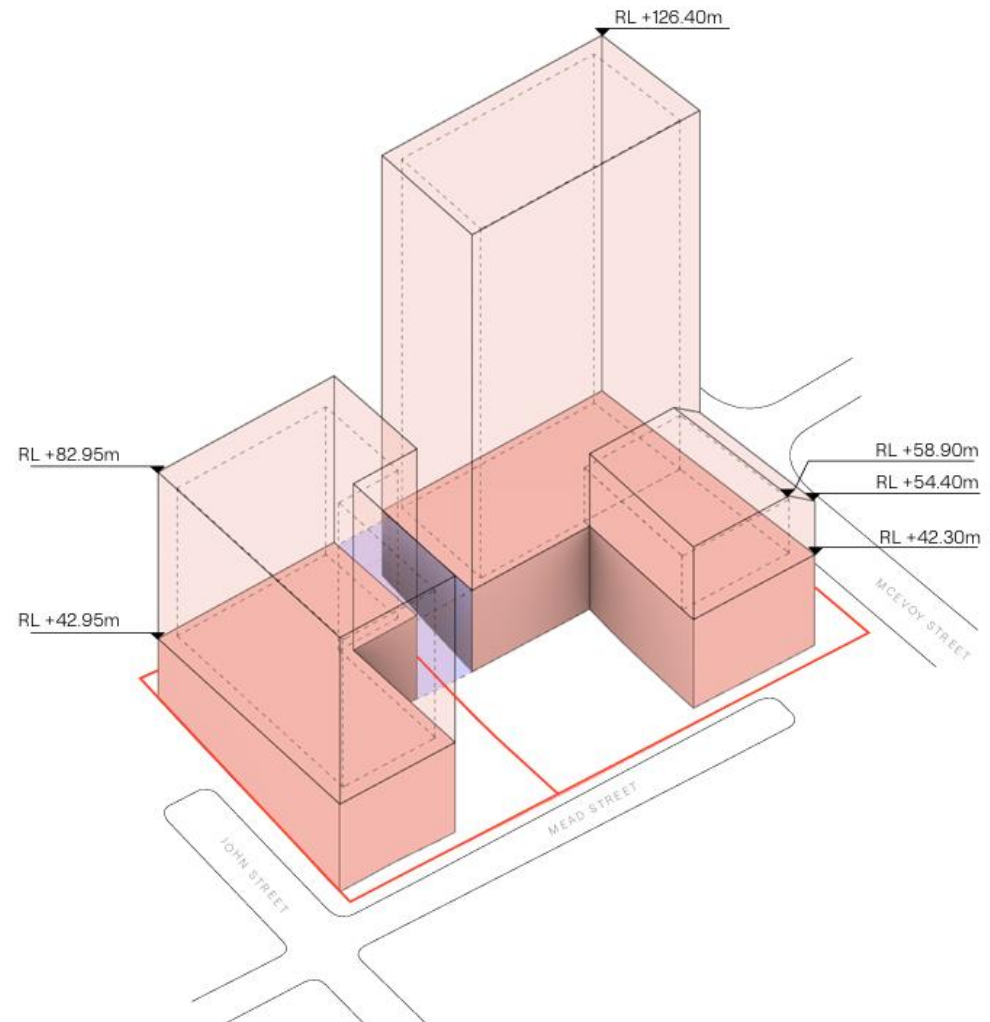
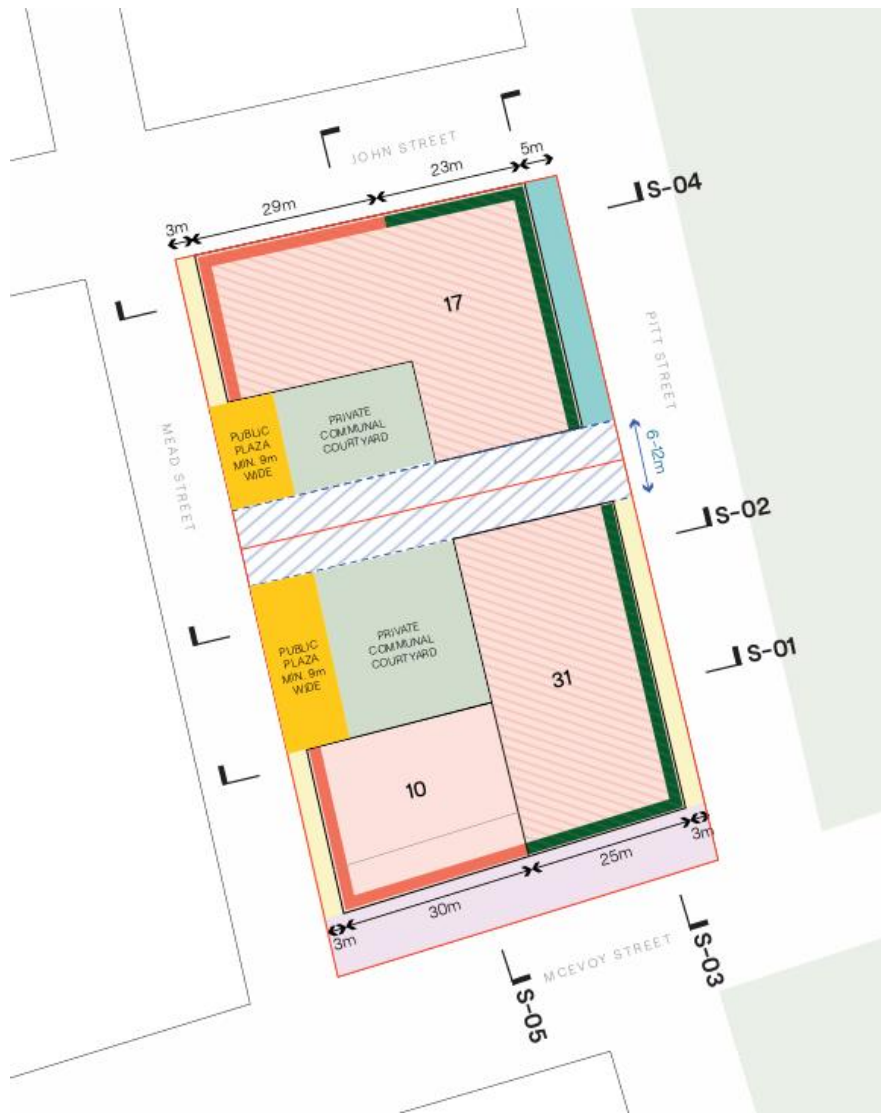
**Figure 43** Block 8 maximum storey heights and building envelope diagrams

Source: Concept Envelope Plans prepared by SJB



**Figure 44** Block 9 maximum storey height and building envelope diagram

Source: Concept Envelope Plans prepared by SJB



**Figure 45** Block 10 maximum storey height and building envelope diagrams  
 Source: Concept Envelope Plans prepared by SJB

## 6.2.6 Land Use and Housing Tenure

The concept SSDA seeks consent for a residential-led mixed-use precinct supported by complementary non-residential uses and integrated public domain works. The land use framework is structured to deliver housing diversity, support social inclusion and enable the co-location of homes with services, open space and public transport.

### Residential Uses

The concept SSDA includes up to 267,197.64m<sup>2</sup> of residential accommodation (approximately 3,300 dwellings), comprising:

- A minimum 30 per cent of residential GFA to be used for the purposes of social housing premises (the social Housing will be owned by Homes NSW and managed by Link Wentworth and Birribee Housing),
- A maximum of 50 per cent of residential GFA to be used for the purposes of 'market housing' / 'private housing', and
- Approximately 20 per cent of residential GFA to be used for the purposes of affordable housing, representing the balance between the minimum social housing and the maximum market housing that is proposed, noting that at least 7 per cent of residential GFA must be used for the purposes of affordable housing that is owned and managed by a community housing provider in perpetuity.

Further details of the operation of the proposed social and affordable housing are outlined as follows:

- 20 per cent of the social housing and 15 per cent of the affordable housing (by GFA) will be prioritised for Aboriginal residents.
- A minimum 7 per cent of residential GFA is proposed as affordable housing that will be owned and managed by City West Housing who are a community housing provider. The minimum 7 per cent affordable housing will be provided in perpetuity. Any additional affordable housing delivered in the precinct must be used as affordable housing for a minimum period of 25 years.
- 85 per cent of the social housing will achieve silver standards of the Liveable Housing Design Guidelines and 15 per cent of the social housing will achieve gold standards of the Liveable Housing Design Guidelines.

A detailed breakdown of the possible residential tenure breakdown and unit mix, as confirmed through the reference design is provided in **Section 6.3**.

### Non-Residential Uses

The concept SSDA indicatively outlines the distribution of non-residential GFA, across Blocks 3, 4, 8, 9, and 10. These non-residential uses are intended to support street activation, community life, and access to local services. They are generally located at ground-floor levels aligned with identified active frontage zones, with some uses extending up to the third floor within selected development blocks.

Provision has also been made for anchor non-residential tenancies within Block 4 and Block 9 as required by the revised Design Guide. It is anticipated that a supermarket will be provided at Block 9 and community uses will be provided at Block 4. The final location is to be determined at the detailed application stage.

The breakdown of non-residential uses as envisioned within the indicative reference scheme is provided in **Section 6.3** and **Table 9**.

### Community Related Uses

Community uses (which includes, but is not limited to, uses that are defined as 'community facilities') have been distributed across the precinct to provide equitable access. A total 5,389m<sup>2</sup> of community uses are shown within the reference scheme, in accordance with the minimum 5,000m<sup>2</sup> required under clause 7.29(3) of the Sydney LEP 2012. The proposed community related uses include:

- centre-based childcare facilities; and
- Other community facilities

## 6.2.7 Public Domain and Landscaping

The EIS is accompanied by a Landscape and Public Domain concept Plan prepared by Aspect Studios (**Appendix J**). Drawing upon an analysis of the site and its surroundings, the concept SSDA presents a landscaping and public domain strategy for the public and communal open spaces as described in the proceeding section.

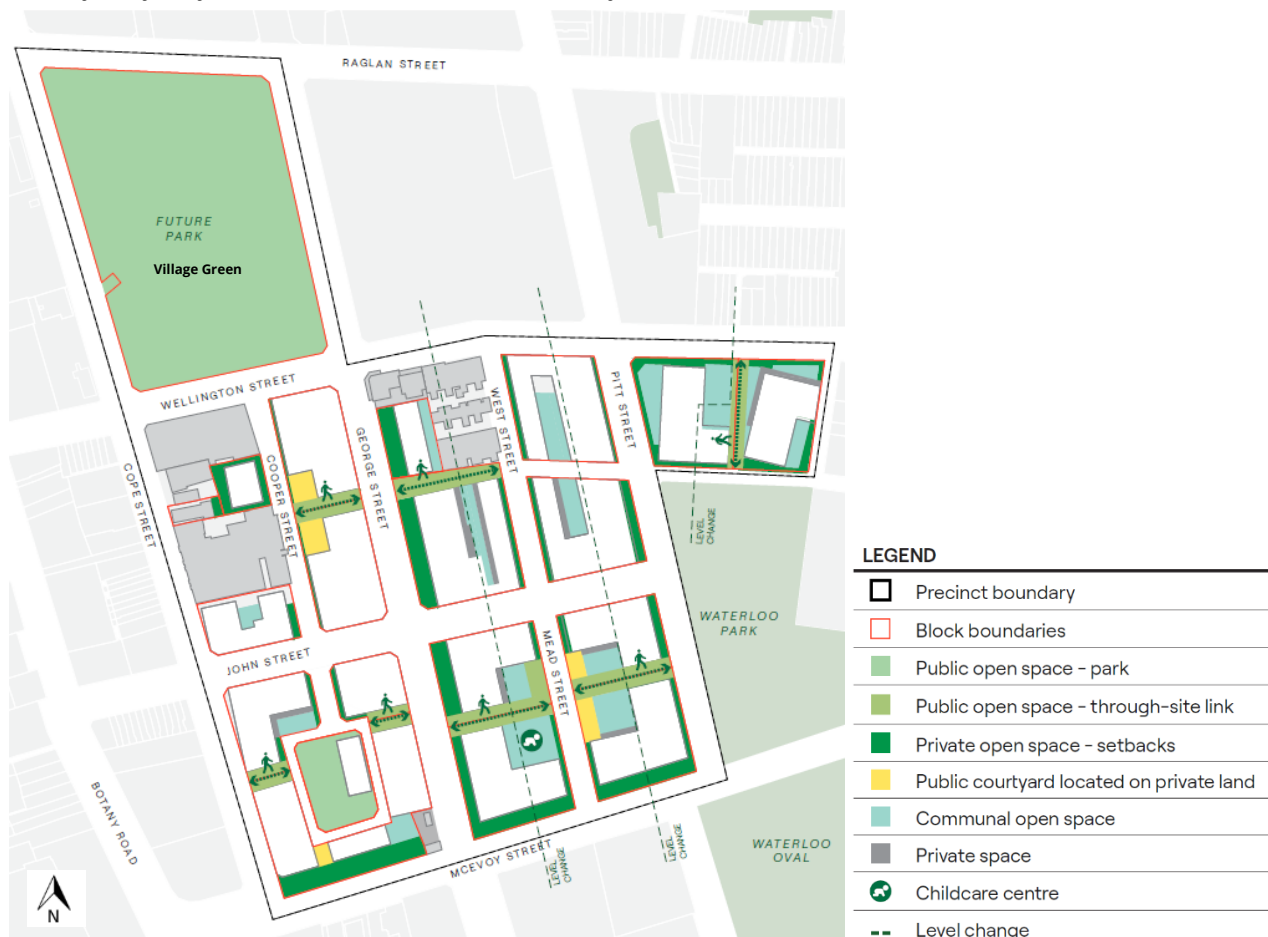
### Public Domain and Open Space Network

The concept SSDA includes a coordinated public domain and open space network across the Waterloo South Precinct Area. The network comprises streets, parks, plazas and through-site links that structure movement, support social activity and connect the precinct to surrounding neighbourhoods and the Waterloo metro station.

Publicly accessible open space is proposed in the form of:

- a district-scale park (the Village Green);
- a neighbourhood park within Block 8; and
- a series of plazas, widened footpaths and landscaped through-site links integrated within development blocks and street corridors.

The Village Green is the principal public open space within the precinct and will function as a green gateway and focal point for Waterloo South. The park is intended to accommodate informal recreation, community gathering and events and to serve both future residents and the wider community. The design and delivery of the Village Green will be led by the City of Sydney in collaboration with the community and relevant stakeholders.



**Figure 46** Open Space Network

Source: Design Report prepared by SJB

### Street Network and Connectivity

The public domain network is structured around George Street, which forms the primary north-south civic and green spine through the precinct. George Street connects key public spaces and surrounding neighbourhoods and is designed to accommodate a mix of pedestrian-priority, shared and vehicle-accessible environments. Active ground-floor uses and community facilities are generally located along this spine to support street activation.

East-west permeability is provided through a fine-grain network of secondary streets, shared zones and through-site links. These connections improve access between neighbourhoods, open spaces, community facilities and public transport and respond to the site's topography and historic watercourses.

### Neighbourhood Structure and Public Domain Character

The coordinated public domain framework is expressed through four interconnected neighbourhoods, each with a distinct public domain character that responds to site conditions, surrounding context and intended uses, while collectively forming a coherent and legible precinct.

- **Village Green:** The Village Green functions as the social and recreational heart of Waterloo South. Its public domain character varies in response to existing trees, topography and historic landscape conditions. A network of paths connects the park to surrounding streets, George Street and the Waterloo metro station.
- **George Street Neighbourhood:** George Street functions as the primary civic and social spine of Waterloo South. The public domain is characterised by generous tree canopy, widened footpaths, plazas and gathering spaces that support pedestrian activity. Active ground-floor uses and community facilities are generally concentrated along this corridor to reinforce its role as the main street and linear green spine of the precinct.
- **Community and Creatives Neighbourhood:** Located generally to the west of George Street, this neighbourhood is characterised by a fine-grain, permeable public domain comprising shared streets, laneways, through-site links and small plazas. These spaces are intended to support community and creative uses, with flexible public spaces and pedestrian-priority environments.
- **Hillside Neighbourhood:** The Hillside Neighbourhood occupies the eastern, elevated portion of the site and is defined by a quieter, predominantly residential public domain character. Streets are designed as low-speed environments with landscaped edges, strong residential interfaces and direct connections to adjacent open spaces, including Waterloo Park.

### Deep Soil and Tree Canopy Coverage

The SSDA prioritises the provision of deep soil zones and the retention and enhancement of tree canopy as fundamental components of the concept landscape and public domain strategy. The Waterloo South Precinct Area contains a significant number of mature trees, including established fig trees along key streets such as George Street and McEvoy Street, which contribute to local character, shade, amenity and microclimate regulation.

Deep soil planting is proposed across the precinct in accordance with the revised Design Guide requirements and forms an integral part of the tree retention and replacement strategy. Larger, consolidated areas of deep soil are provided within the Village Green, the Block 8 park, internal courtyards, street setbacks and landscaped through-site links, as well as along key north-south and east-west connections. These areas are intended to support the establishment of large canopy trees, optimise soil volumes and ensure the long-term health and resilience of the urban forest.

The proposed development seeks to maximise tree retention and support long-term canopy growth through a coordinated approach to deep soil provision, planting on structure and strategic building setbacks. Increased setbacks along residential edges and green corridors allow for meaningful tree planting, contiguous deep soil zones and landscaped thresholds that soften the interface between public and private realms.

The location and extent of deep soil areas, communal open space and retained trees have been informed by detailed design investigations, balancing landscape outcomes with servicing and infrastructure requirements. This landscape-led approach supports urban cooling, biodiversity and environmental resilience, while accommodating taller built form in a manner that maintains a comfortable, human-scaled street environment and reinforces Waterloo's character as a walkable and connected neighbourhood.

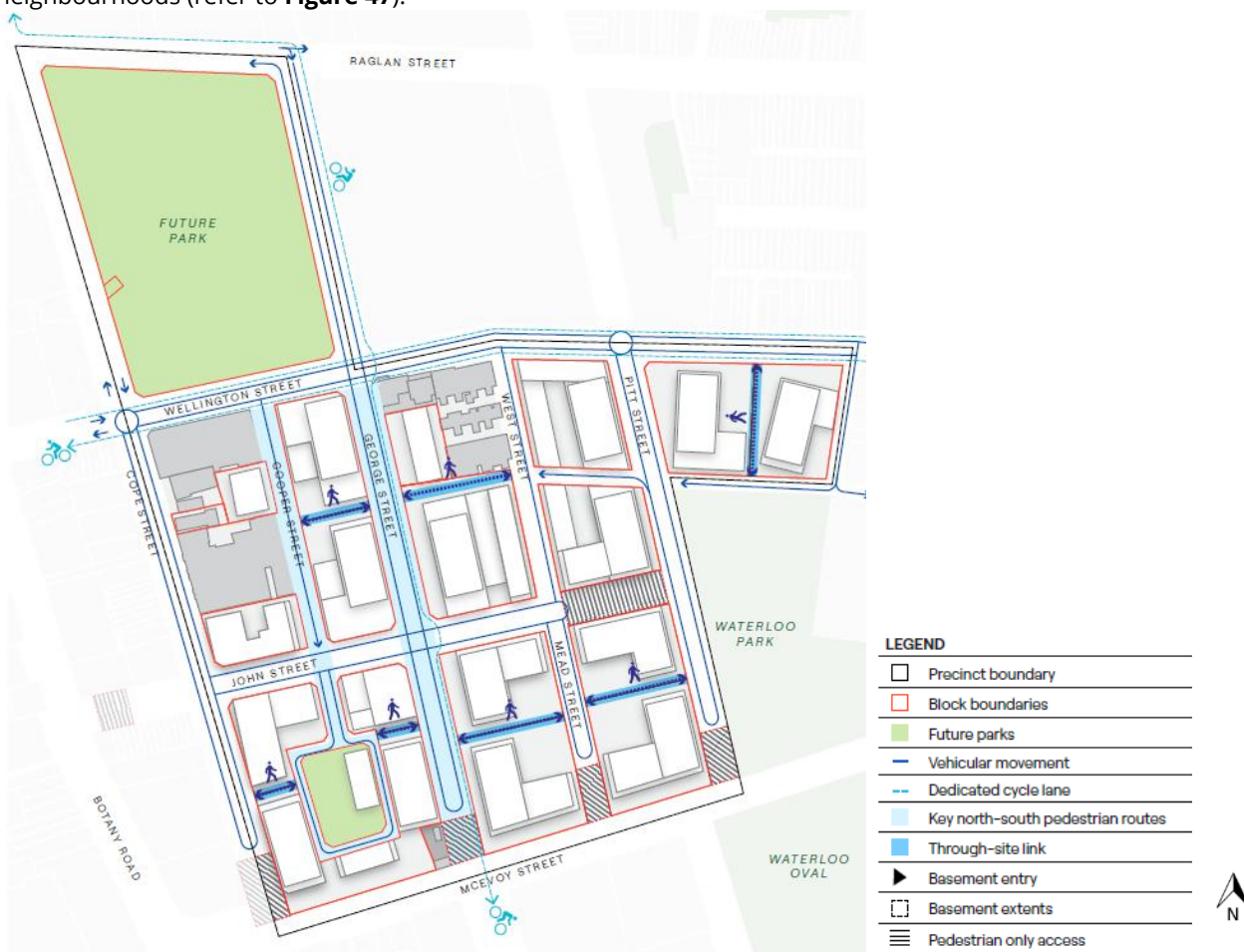
Refer to **Section 9.6** of the EIS for an assessment of the landscape and public domain strategy.

## 6.2.8 Access, Movement and Parking

The concept SSDA establishes a coordinated access and movement framework to support the staged redevelopment of Waterloo South while prioritising pedestrian safety, accessibility and public transport use.

### Pedestrian Access

Pedestrian movement is prioritised throughout the precinct and supported by a fine-grain network of streets, shared zones and through-site links. These routes provide strong north-south and east-west connections across the site and link key destinations including the Waterloo metro station, public open spaces, community facilities and surrounding neighbourhoods (refer to **Figure 47**).



**Figure 47** Movement Plan

Source: Design Report prepared by SJB

### Vehicular Access

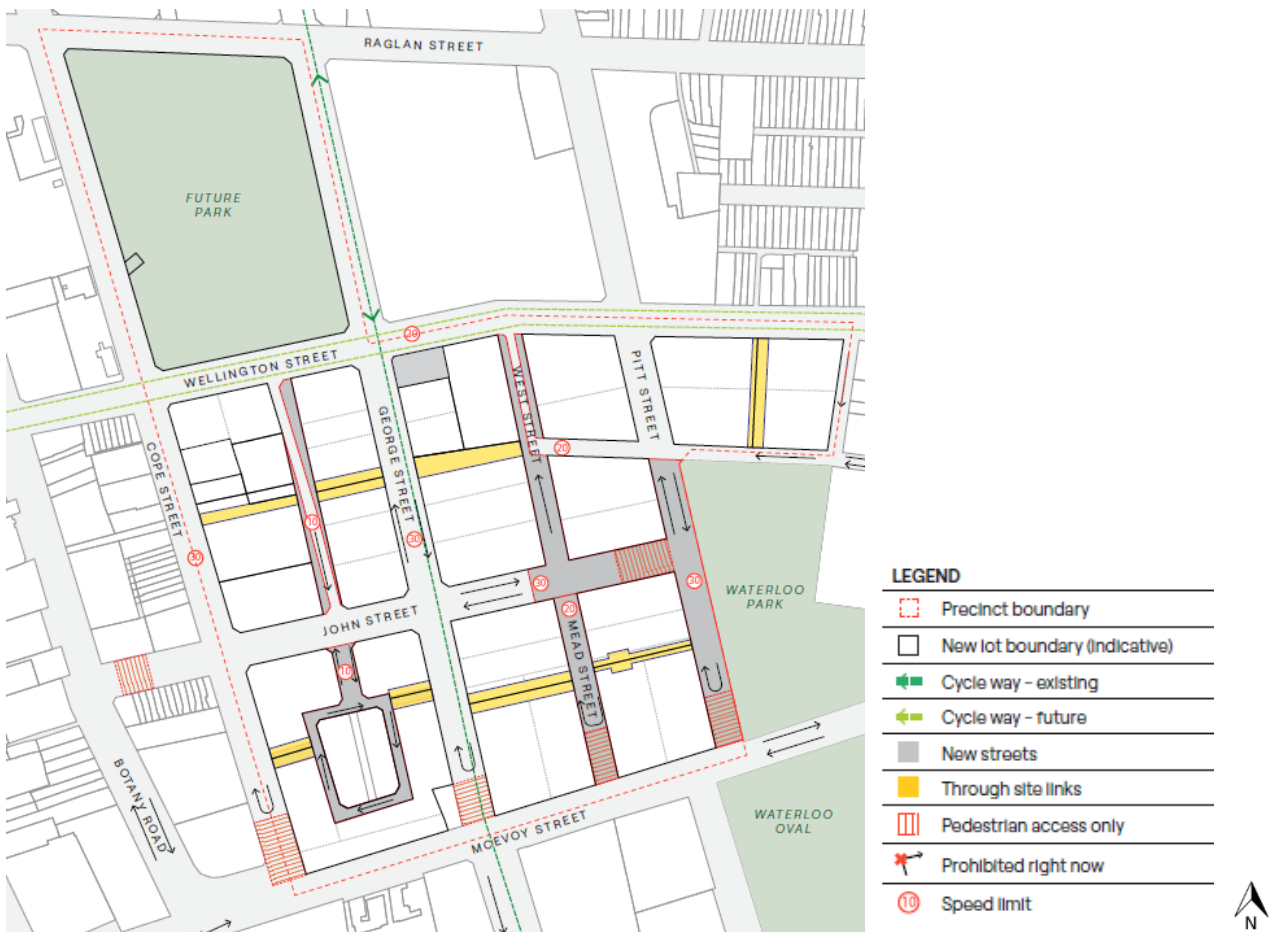
Vehicular access to the precinct is proposed via a limited number of defined access points from the surrounding road network (refer to **Figure 48**). Wellington Street functions as the primary vehicular route through the precinct, accommodating vehicle and cyclist movement in a manner consistent with the intent established within the 2022 Design Guide.

The internal street network generally reflects the structure established in the 2022 Design Guide, with targeted refinements to improve safety, legibility and operational efficiency. Yield streets are proposed on Mead Street and Pitt Street (south of Kellick Street), facilitating two-way vehicle movement within a single travel lane.

Cooper Street is proposed to operate as a one-way street in a southbound direction. There is currently no public vehicular access proposed between the precinct and McEvoy Street (maintaining the current access arrangements), however the City of Sydney have requested that the concept SSDA does not restrict the potential ability to access McEvoy Street from George Street in the future, if required.

A right-turn movement from Botany Road into Wellington Street is proposed to be retained. While the 2022 Design Guide contemplated removal of this movement, its retention responds to consultation with the City of Sydney and NSW

Government agencies and reflects the constrained nature of vehicular access to the precinct. Retaining this movement supports necessary access to the precinct by private vehicles when approaching from the south. The impacts of this arrangement are addressed in the Traffic and Parking Assessment at **Appendix CC** and in **Section 9.14**.



**Figure 48** Access and circulation  
 Source: Updated Waterloo South Design Guide prepare by SJB

Servicing, waste collection and loading are accommodated within basement levels or designated service areas within development blocks.

Emergency vehicle access is provided throughout the precinct via the public street network and internal streets designed to accommodate emergency vehicles in accordance with relevant standards. Building siting, setbacks and through-site connections are designed to ensure appropriate emergency access to all development blocks.

**Cyclist Movement**

Cyclist movement through and around the precinct is supported by both internal connections and integration with the surrounding active transport network. Dedicated cycle lanes along George Street and Wellington Street facilitate continuity of regional cycling routes through the precinct (refer to **Figure 47**). Within the site, shared streets and low-speed environments support cyclist permeability and safe interaction with other users.

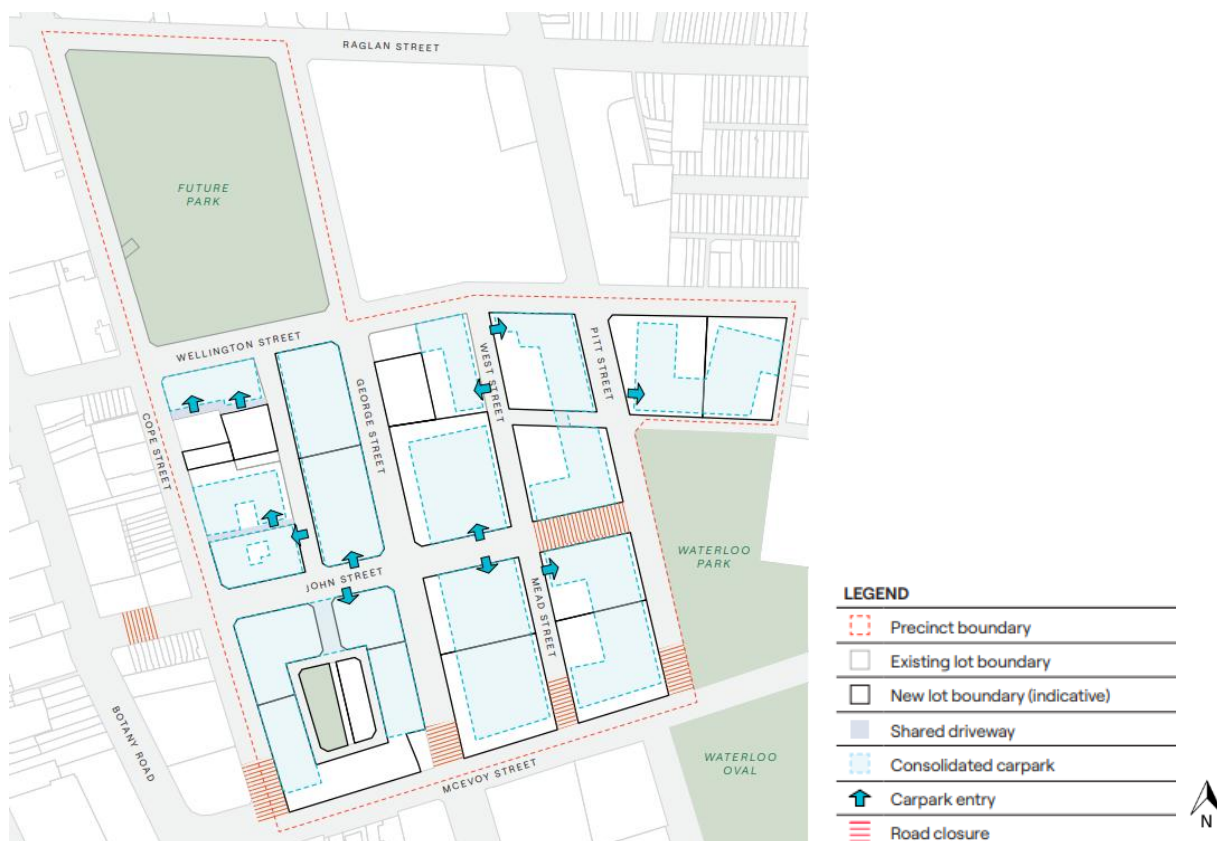
Bicycle parking and end-of-trip facilities will be provided in accordance with relevant planning controls and City of Sydney requirements. Based on the indicative dwelling mix proposed in the concept SSDA, a minimum of 3,824 bicycle parking spaces are to be provided across the site. End of trip facilities will be provided to support non-residential land uses. A minimum of 85 lockers and 19 showers/ change rooms are to be provided across the site.

**Car parking**

Car parking is proposed to be provided predominantly within basement levels and may be shared across land uses where appropriate, however the concept SSDA also makes provision for on-street car parking. The indicative location of vehicular access and egress to basement levels is depicted in **Figure 49**.

Under the provisions of the Sydney LEP 2012, based on the land uses and indicative dwelling mix proposed a maximum of 2,211 car parking spaces are permitted at the site. The reference scheme triggers the requirement for approximately 1,500 car parking spaces across all land uses, excluding on-street parking, which is below the LEP maximum. Importantly, the concept SSDA does not seek consent for a limit on the residential car parking to what is currently accommodated in the reference scheme, but rather residential car parking will be assessed and allocated within detailed applications in accordance with the maximum Sydney LEP 2012 rates.

Retail parking is proposed to be consolidated into Block 9 as opposed to being distributed across the precinct. This is to support the delivery of a supermarket within Waterloo South. Separately, between 32-50 car parking spaces are to be provided as car share spaces, however again the exact number of car share spaces proposed within the basements of each building will be confirmed within future detailed applications.



**Figure 49** Indicative car park entrances

Source: Updated Waterloo South Design Guide prepared by SJB

## 6.3 Reference Scheme

SJB has prepared a reference scheme to illustrate how the site may be developed within the parameters of the concept SSDA, including the proposed planning envelopes, land use distribution and maximum GFA, as discussed in **Section 6.2**.

The reference scheme is illustrative only and is not proposed or sought for approval. It is provided as a proof of concept to demonstrate that the proposed planning envelopes and development parameters are capable of accommodating the permissible GFA while achieving acceptable built form relationships, residential amenity and public domain outcomes.

### 6.3.1 Land Use

#### Residential

The reference scheme prepared by SJB illustrates one way in which residential dwellings can be delivered across Waterloo South. A total of 3,329 residential dwellings can be provided within the proposed building envelopes in the following indicative tenure breakdown:

- 1,562 market housing dwellings
- 1,073 social housing dwellings
- 694 affordable housing dwellings

The residential tenure breakdown and indicative unit mix achieved within the reference scheme is outlined in **Table 8** below.

**Table 8** Indicative residential unit mix and yield

Block	Tenure	Studio	1 bedroom	2 bedroom	3 Bedroom	4 bedroom	Total
<b>Block 2</b>							
2D	Social housing	-	66	28	-	-	94
<b>Block 3</b>							
3AB1	Affordable housing	-	112	96	24	-	232
3BB1	Affordable housing	-	91	66	17	-	174
<b>Block 4</b>							
4BB1	Social housing	-	30	12	-	-	42
4CB1	Market	-	71	101	29	2	203
4CB2	Social housing	5	20	26	4	2	57
<b>Block 5</b>							
5AB1	Market housing		59	96	28	0	183
5AB2	Social housing	2	12	17	2	1	34
<b>Block 6</b>							
6AB1	Social housing	10	74	107	16	4	211
6AB2	Social housing	2	9	12	3	-	26
<b>Block 7</b>							
7AB1	Market housing	-	88	126	38	2	254
7BB1	Affordable housing	-	104	90	20	-	214
<b>Block 8</b>							
8AB1	Market housing	-	100	144	43	2	289
8AB2	Social housing	3	9	11	4	0	27
8AB3	Social housing	12	56	72	8	2	150
8BB1	Affordable housing	-	37	30	7	-	74
8CB1	Social housing	5	19	36	7	2	69
<b>Block 9</b>							
9AB1	Market housing	-	117	156	49	2	324
9BB1	Social housing	14	55	85	18	2	174
<b>Block 10</b>							
10AB1	Market housing	-	109	154	42	4	309
10BB1	Social housing	14	66	84	19	6	189
<i>Unit mix breakdown</i>		57	1,304	1,549	378	31	3,329
<b>Total indicative maximum yield</b>							<b>3,329</b>
							<ul style="list-style-type: none"> <li>• Market: 1,562</li> <li>• Affordable: 694</li> <li>• Social: 1,073</li> </ul>

## Non-residential uses

The reference scheme prepared by SJB illustrates one way in which non-residential uses can be distributed across Waterloo South (refer to **Table 9**). The reference scheme provides a total of 15,305m<sup>2</sup> of non-residential floorspace.

**Table 9** Indicative non-residential land use distribution

Block	Non-residential use	Indicative GFA (m <sup>2</sup> )
<b>Block 2</b>		
Ground level	VPA	435
	Community	99
	Mixed Use	177
Level 02	VPA	435
	Mixed Use	177
Level 03	VPA	435
Level 4	Community	435
<i>Block 2 total</i>		2,193
<b>Block 3</b>		
Ground level	Non-residential/ retail	2,552
<i>Block 3 total</i>		2,552
<b>Block 4</b>		
Ground level	Non-residential/ retail	770
	Community	1,736
<i>Block 4 total</i>		2,506
<b>Block 8</b>		
Ground level	VPA	432
	Non-residential/ retail	1,659
	Community	350
Level 02	VPA	432
<i>Block 8 total</i>		2,873
<b>Block 9</b>		
Ground level	Non-residential/ retail (including supermarket)	2,000
	Non-residential/ retail	634
Level 02	Non-residential/ retail	443
Level 03	Community	600
<i>Block 9 total</i>		3,677
<b>Block 10</b>		
Ground level	Non-residential/ retail	513
Level 02	Non-residential/ retail	776
Level 03	Non-residential/ retail	215
<i>Block 10 total</i>		1,504
<b>Total non-residential GFA</b>		<b>15,305m<sup>2</sup></b>

### 6.3.2 Built Form

The reference scheme validates that the proposed building envelopes can:

- Accommodate the maximum permitted GFA across the site.
- Support the anticipated tenure mix and location of different housing tenure types across the precinct.
- Accommodate a residential floor plan that has a high degree of residential amenity, including being generally consistent with the design criteria of ADG.
- Deliver the required amount of non-residential floor space (including retail uses along George Street, and community floor space as required by the Sydney LEP 2012 across the precinct).
- Provide pedestrian and vehicular access and movement through the site consistent with the concept scheme.

Consistent with the parameters established under the concept envelopes, the reference scheme presents a built form that can achieve the key design objectives for the redevelopment of Waterloo South. The reference scheme will form the basis of the detailed design development for the redevelopment of the site, however the detailed plans will be further refined and developed with Architects selected in accordance with the Design Excellence Strategy for the site.

#### Block 1

Block 1 comprises a new 20,000m<sup>2</sup> public park. The Block 1 park will comprise a series of distinct yet interconnected landscape spaces, possibly including shaded garden areas, a foraging and bushtucker garden, a water basin responding to the site's natural low point, and a range of seating, play and gathering areas. A network of pedestrian paths, including a central circular path, will unify the park and facilitate movement between the Metro station plaza and the George Street social spine.

The Block 1 park is to be designed by the City of Sydney, with the intention of the design to activate the parks edges, with opportunities for community amenities, pop-up events and temporary street closures along George Street to extend social activity beyond the park boundaries. Landscape character will vary across the site, including enhanced planting around existing mature fig trees to support pollinators, wetland-inspired planting in lower areas reflecting the site's historical ecology, and dense endemic edible planting to support cultural exchange and community gardening.

At the heart of the Green will be a large open lawn designed to accommodate events and informal recreation, surrounded by seating. Changes in elevation toward George Street will create an amphitheatre-like setting with turf and timber seating, providing views across the park and reinforcing its role as a focal point for community life.

#### Block 2

Block 2 comprises Buildings 2BB1, 2CB1 and 2DB1, which together deliver a mix of community, non-residential and residential uses arranged to support activation, amenity and strong integration with the surrounding public domain.

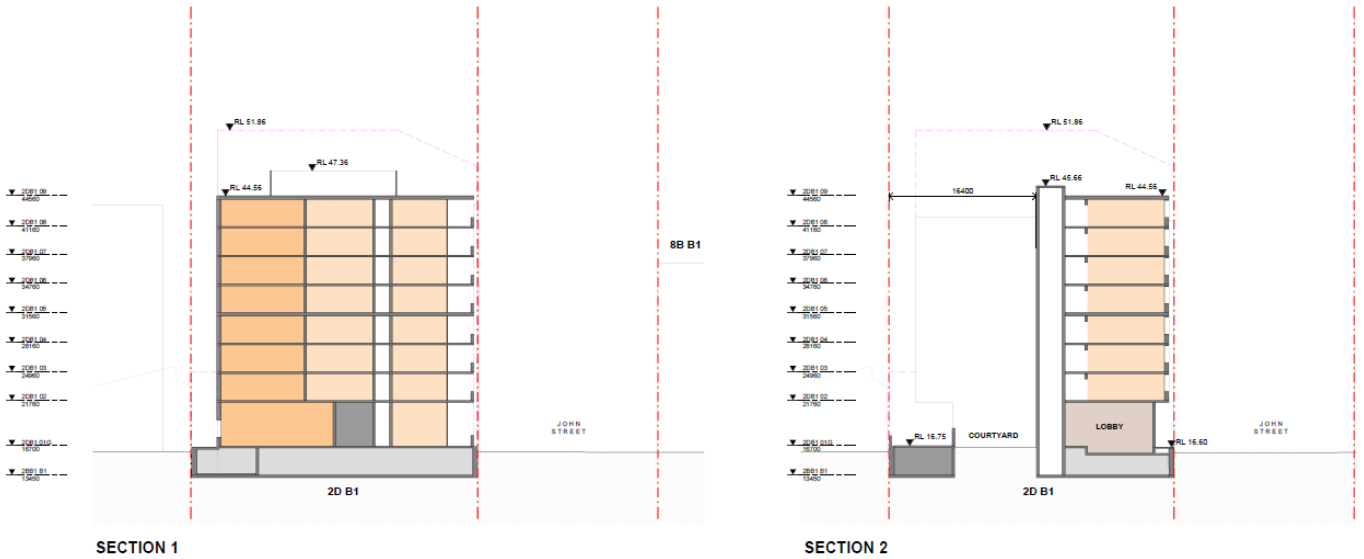
Building 2BB1 comprises a four-storey building to be dedicated to Council for community facilities addressing Cooper Street. The location and scale of Building 2BB1 are intended to reinforce street activation and provide accessible community infrastructure in close proximity to the Village Green.

Building 2CB1 relates to existing locally heritage listed, two storey terrace houses. These terrace houses are proposed to be retained under the concept SSDA. Refer to **Section 9.10** for further detail.

Building 2DB1 is an eight-storey, U-shaped residential building comprising:

- a four-storey podium fronting Cooper Street, and
- an eight-storey street wall to Cope Street.

All dwellings within Building 2DB1 are dedicated to social housing, and the built form is fully contained within the approved concept envelope, as illustrated in **Figure 50**. It is anticipated that this building will be allocated to Aboriginal tenants, including specifically for Aboriginal seniors.

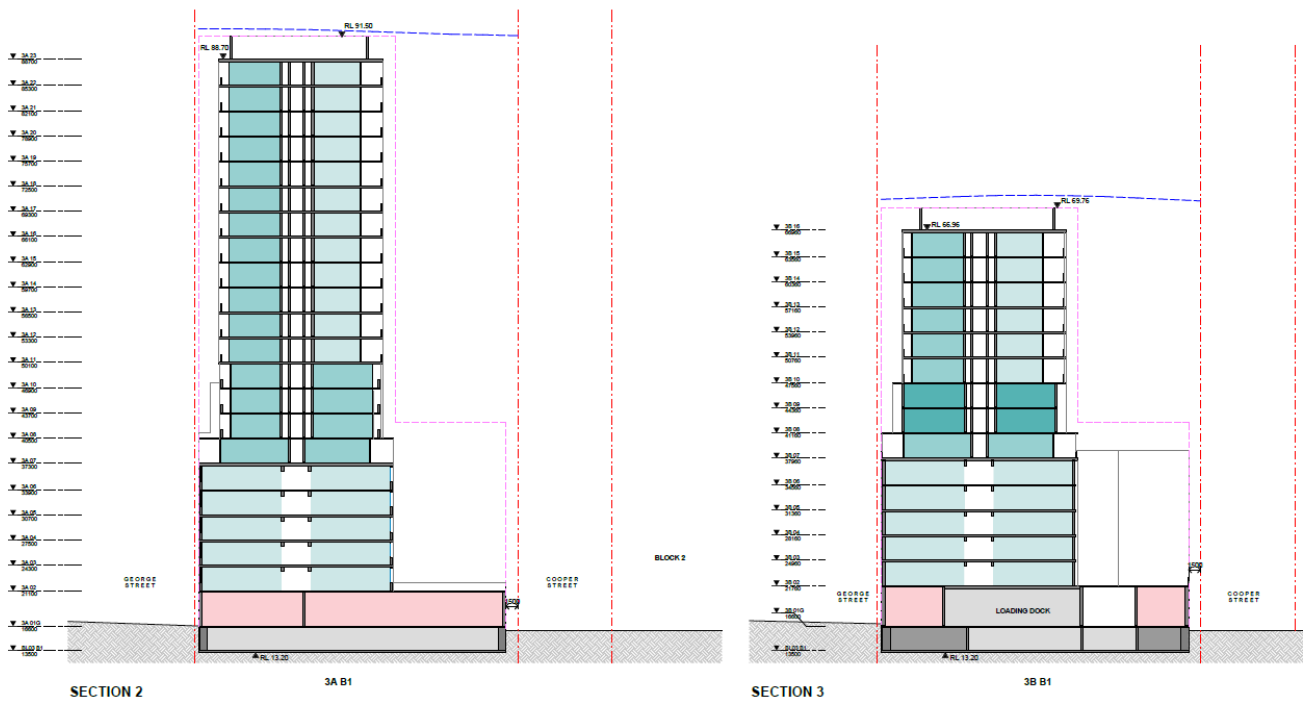


**Figure 50** Block 2 Section  
 Source: Design Report prepared by SJB

**Block 3**

Block 3 comprises two buildings, identified as 3AB1 and 3BB1, arranged as articulated, double-loaded L-shaped podium forms unified above a single-level basement structure.

Each building comprises a 6 storey street wall to George Street and a single storey podium, with upper levels setback to Cooper Street. Building 3AB1 reaches 22 storeys and Building 3BB1 steps up to a maximum height of 15 storeys. All levels above ground are dedicated to affordable housing and the built form is contained within the concept envelope, as illustrated in **Figure 51**.



**Figure 51** Block 3 - Section 2 (3AB1) and Section 3 (3BB1)  
 Source: Design Report prepared by SJB

## Block 4

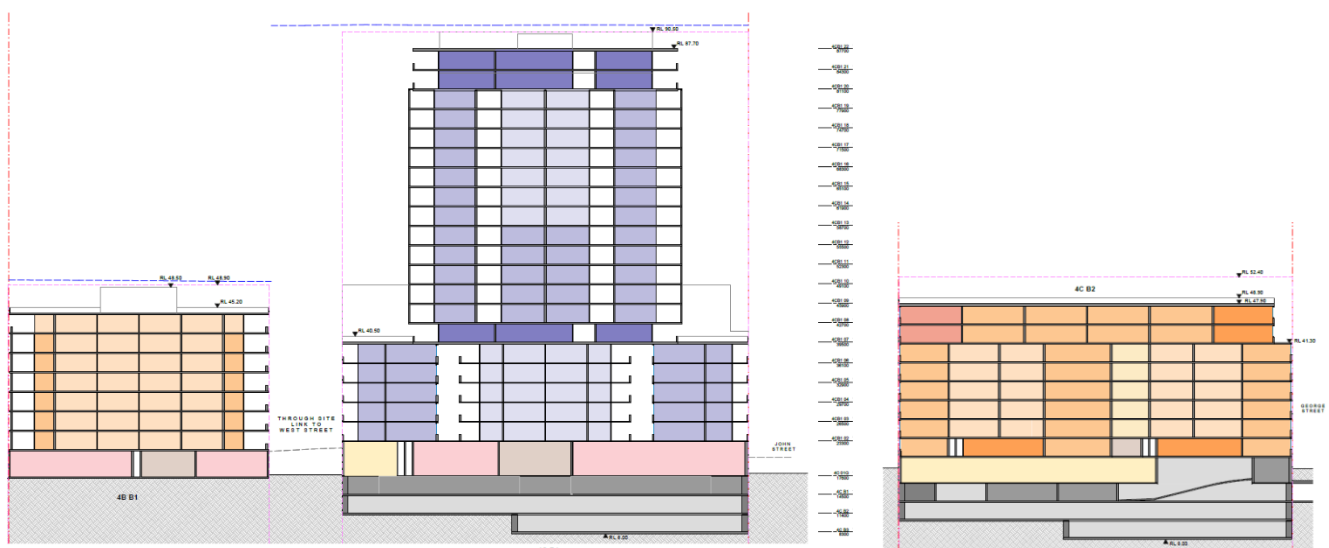
Block 4 comprises three buildings, identified as 4BB1, 4CB1 and 4CB2. Building 4BB1 stands alone to the north of the block and is a single loaded rectangular form.

Buildings 4CB1 and 4CB2 are arranged as a double loaded podium above a three-level basement structure on the southern portion of Block 4. This configuration establishes a cohesive built form while allowing for variation in scale and use across the block.

Building 4BB1 is 8 storeys in height, with all levels above ground dedicated to social housing. The ground floor comprises non-residential tenancies behind a landscaped setback to George Street.

Buildings 4CB1 and 4CB2 share a single podium level comprising a mix of community and non-residential uses, with Building 4CB1 ranging from a 6 storey podium to a maximum height of 21 storeys and accommodates market housing. Building 4CB2 is 9 storeys in height and its residential component dedicated to social housing. The built form of each building within Block 4 is fully contained within the concept envelopes, as illustrated in **Figure 52**.

The ground floor of 4CB1 and 4CB2 includes a major community anchor tenancy.



**Figure 52** Block 4 Sections (4BB1 left, 4CB1 centre, 4CB2 right)

Source: Design Report prepared by SJB

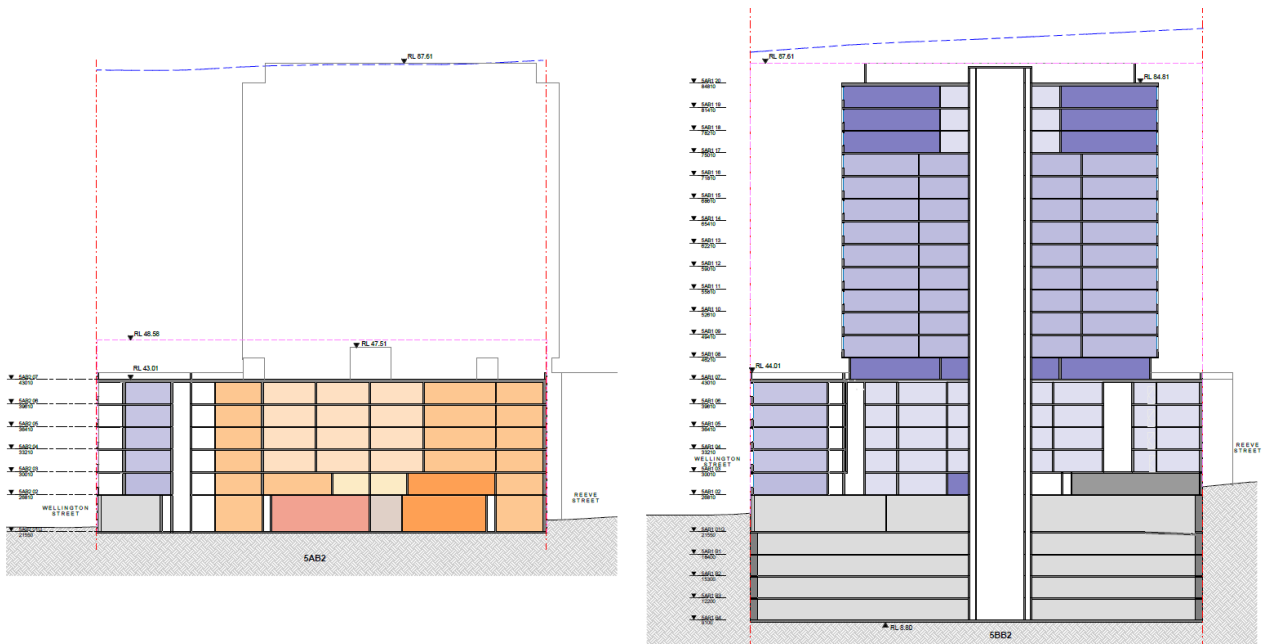
## Block 5

Block 5 is made up of two buildings in a u-shape configuration, identified as Building 5AB1 and 5AB2. This configuration establishes a block design that encourages passive surveillance of the streets, as the private open space and windows of residential units overlook each street and the internal courtyard.

5AB1 is generally configured as a single-loaded L-shaped building that addresses both Wellington Street and Pitt Street and is atop four full basement levels, as well as a single semi-basement level. The building comprises 19 storeys with a 5 storey street wall to Wellington Street. The building comprises market housing across all levels and is accessed directly from Pitt Street.

Building 5AB2 establishes a mix of non-residential and residential uses at ground level and residential units on levels above. Social housing is the only housing typology proposed within the building and it is located to the western edge of Block 5 and is oriented to West Street with some dwellings addressing Reeve Street at the corner. The orientation of units within Building 5AB2 maximises amenity, particularly by way of solar access and natural cross ventilation.

Both Building 5AB1 and 5AB2 are wholly located within the envelope established by the concept SSDA, as demonstrated by **Figure 53**.



**Figure 53** Block 5 Section (5AB2 left & 5BB2 right)  
 Source: *SJB Design Report*

### Block 6

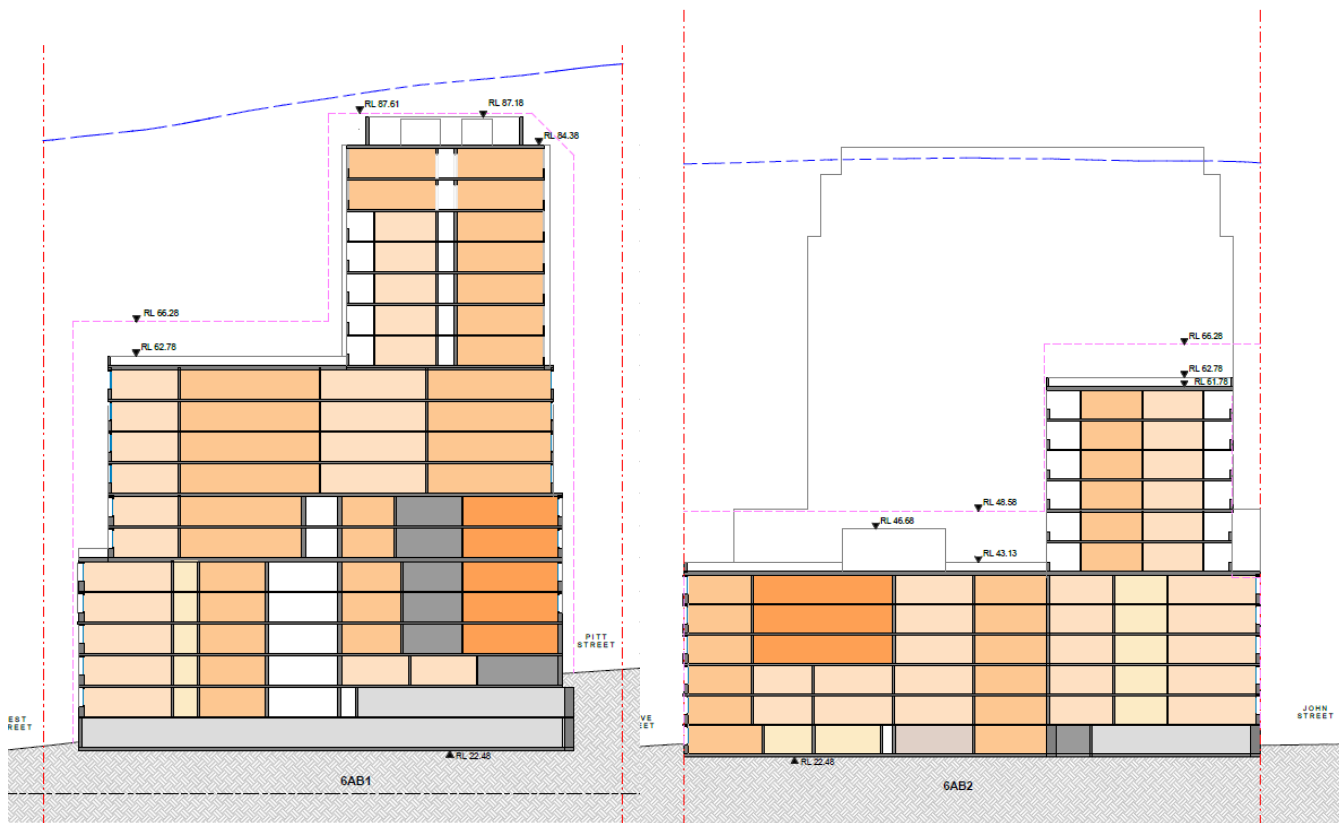
Block 6 comprises two residential buildings, Buildings 6AB1 and 6AB2, both delivering social housing within an integrated podium and shared basement arrangement. The block is bounded by Reeve Street to the north, John Street to the south, West Street to the west and Pitt Street to the east, with built form addressing each frontage and responding to the irregular site geometry.

A shared basement extends beneath both buildings and connection is provided through to the basement of Block 5 under Reeve Street. No direct vehicular access is proposed to the basement of Block 6, with vehicles to access the basement level via Block 5.

Building 6AB1 is located toward the eastern portion of the block, addressing Pitt Street and forming the primary street interface. The building comprises the taller built-form component (17 storeys) within Block 6 and is arranged in a double-loaded residential configuration above the shared podium. Articulation and setbacks are incorporated at upper levels to manage perceived bulk and scale, while lower levels establish a consistent street wall to Pitt Street. Building is provided off Pitt Street through a landscaped area.

Building 6AB2 is located toward the western portion of the block, addressing West Street. The building presents a lower-scale built form relative to Building 6AB1 (part 12 and part 6 storeys), facilitating a stepped and graduated height transition across the block and responding to the surrounding streetscape context. The building is integrated with the shared podium and basement arrangement.

Both Building 6AB1 and 6AB2 are wholly located within the envelope established by the concept SSDA, as demonstrated by **Figure 54**.



**Figure 54** Block 6 Sections (6AB1 left & 6AB2 right)

Source: *SJB Design Report*

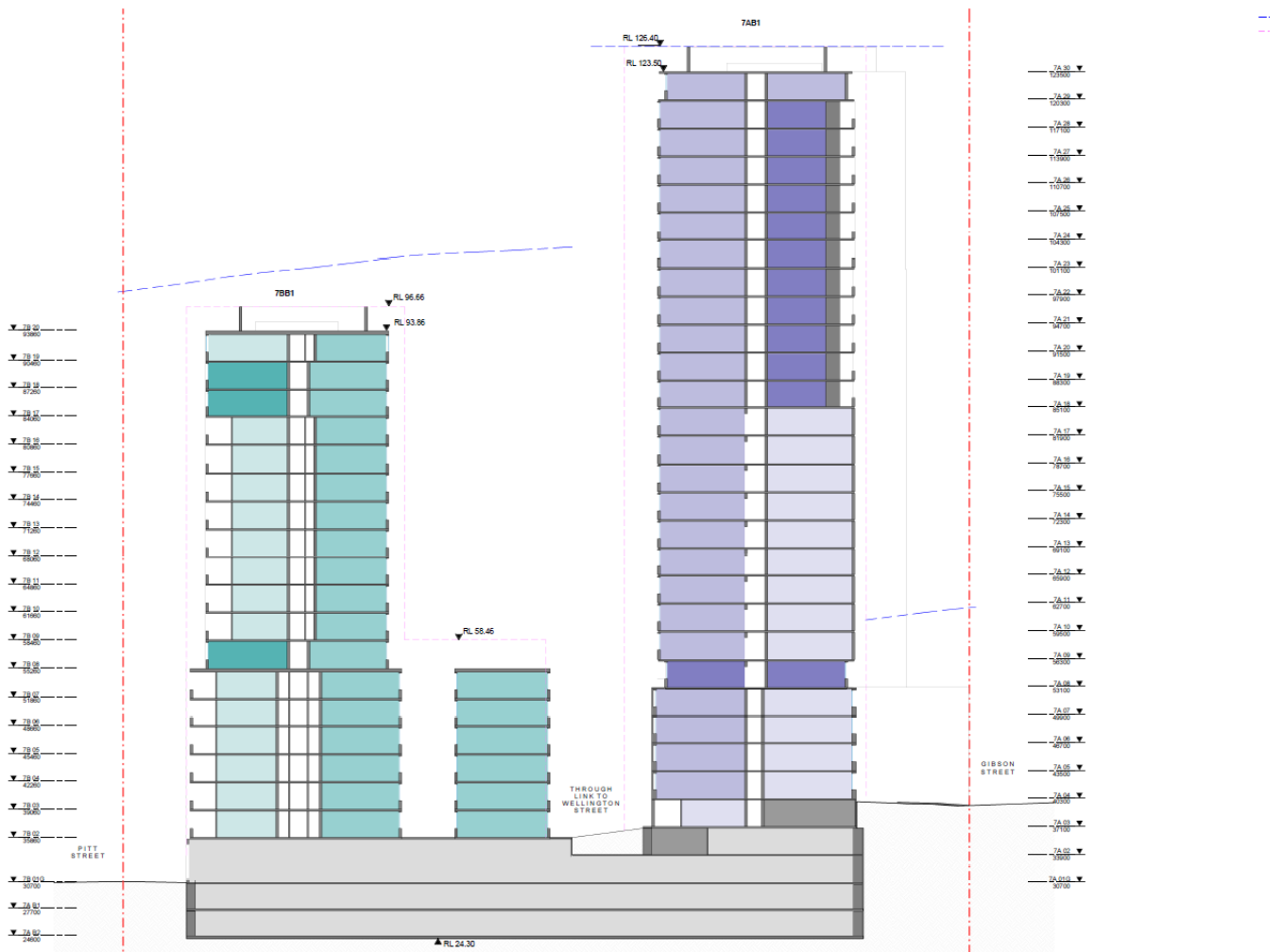
## Block 7

Block 7 comprises two residential buildings, Buildings 7AB1 and 7BB1, delivering a mix of market and affordable housing. The block is characterised by a shared podium and basement arrangement, with built form addressing Wellington Street, Kellick Street, Pitt Street and Gibson Street and contributing to a cohesive streetscape outcome.

Building 7AB1 is a residential flat building comprising market housing, with a built form ranging from part 6 to 28 storeys. The building is arranged in an L-shaped, double-loaded podium that transitions to a rectangular, double-loaded tower form above. This configuration responds to the block geometry while optimising residential amenity, outlook and separation distances at upper levels. Communal open space is provided on the podium levels, including landscaped areas at Levels 2 and 3 supporting resident recreation and social interaction.

Building 7BB1 is a residential building comprising affordable housing, with a built form ranging from part 7 to 19 storeys. Similar to Building 7AB1, the building adopts an L-shaped, double-loaded podium form that progresses to a rectangular, double-loaded tower.

Both Building 7AB1 and 7BB1 are wholly located within the envelope established by the concept SSDA, as demonstrated by **Figure 55**.



**Figure 55** Block 7 Section (7BB1 left & 7AB1 right)

Source: SJB Design Report

## Block 8

Block 8 is organised around a central public park comprising (1,000m<sup>2</sup>) and provides a mixture of housing tenures across 6 buildings (**Figure 56**). The ground plane comprises a series of non-residential and community uses to activate George Street, McEvoy Street, John Street and Cope Street.

Building 8AB1 is a 33-storey residential tower comprising market housing within a double-loaded rectangular form fronting Cope Street. The ground floor accommodates a mix of non-residential uses, contributing to an active street frontage and supporting pedestrian activity along Cope Street. The location of this tower at the south western corner of the block minimises overshadowing to the proposed public park and other residential uses on the block.

Building 8AB2 is an 8-storey building comprising social housing, arranged in a single-loaded rectangular form to optimise amenity and outlook. The ground floor incorporates non-residential uses, supporting activation at lower levels.

Building 8AB3 is a 15-storey residential building comprising social housing within a double-loaded rectangular form. At ground level, community uses front the central public park, reinforcing its role as a focal point for social interaction, while non-residential uses address George Street, contributing to an active and varied streetscape.

Building 8CB1 is located in the north eastern portion of the block and comprises a mixed-use building with an L-shaped double-loaded podium and a double-loaded rectangular tower floor plate, with a maximum height of 10 storeys. Retail uses address George Street and the through-site link, while non-residential uses are located at the corner of John Street and George Street, reinforcing activity at this key intersection. A loading dock is provided at the ground floor of this building with access and egress provided from John Street. Separate vehicular access is provided to the shared basement from a separate access point off John Street. The basement comprises a horseshoe shape to ensure minimal impacts to the proposed public park and the delivery of deep soil.

Building 8DB1 is a two-storey structure accommodating community uses to be dedicated to Council and is, located adjacent to the central open space and supporting community and recreational functions within the precinct.

Building 8BB1 is a 4 to 7-storey residential building comprising affordable housing within a double-loaded rectangular form. Retail uses are provided at ground level fronting the through-site link, reinforcing activation and surveillance along this internal pedestrian connection.

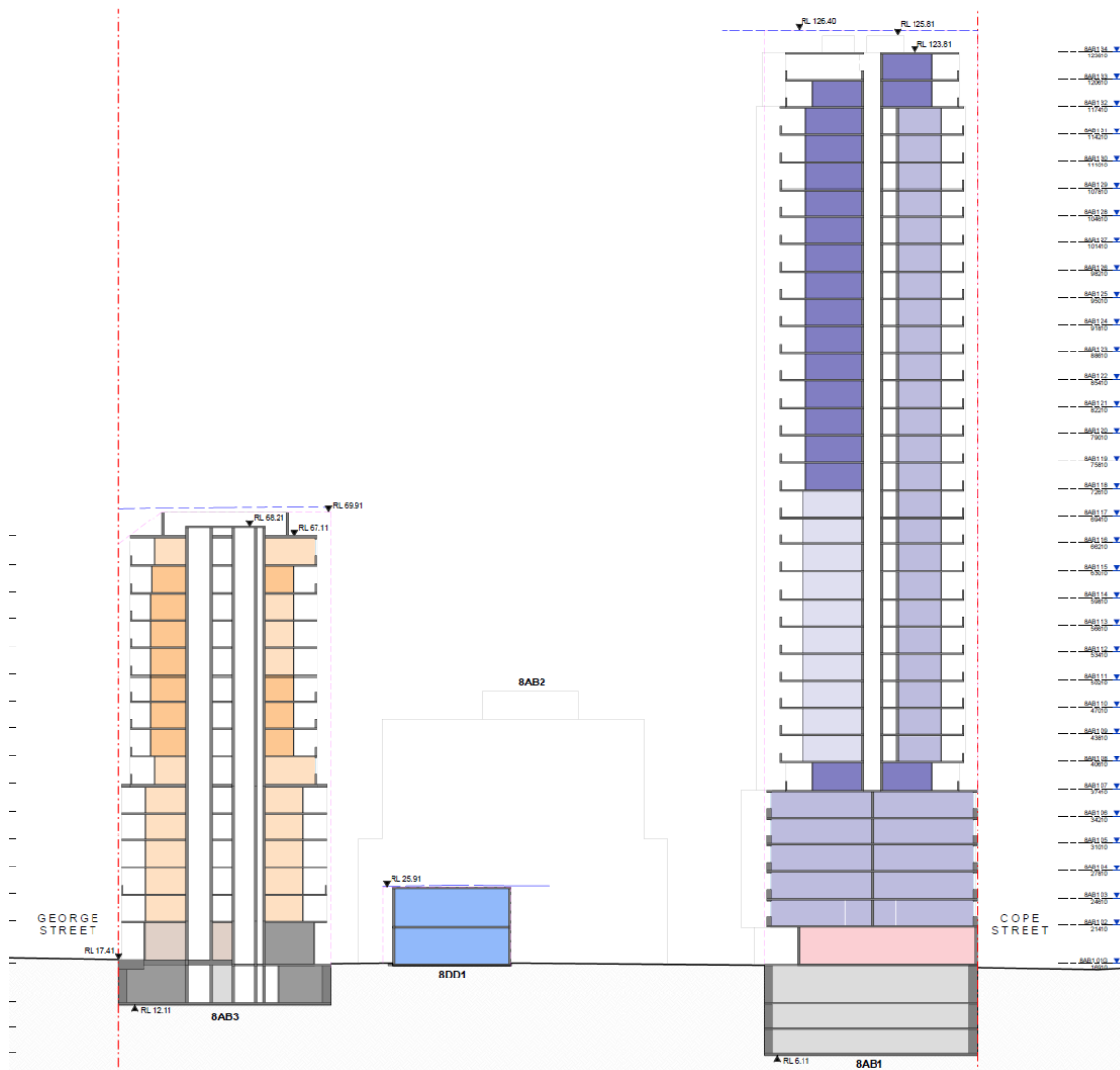
At the centre of Block 8, a public park provides a substantial area of publicly accessible open space, framed by active frontages and community uses. The park integrates with surrounding pedestrian links and the broader open space network, providing recreational, social and environmental benefits at both the block and precinct scale.

All of the buildings on Block 8 are wholly located within the envelope established by the concept SSDA, as demonstrated by **Figure 57, Figure 58 and Figure 59.**

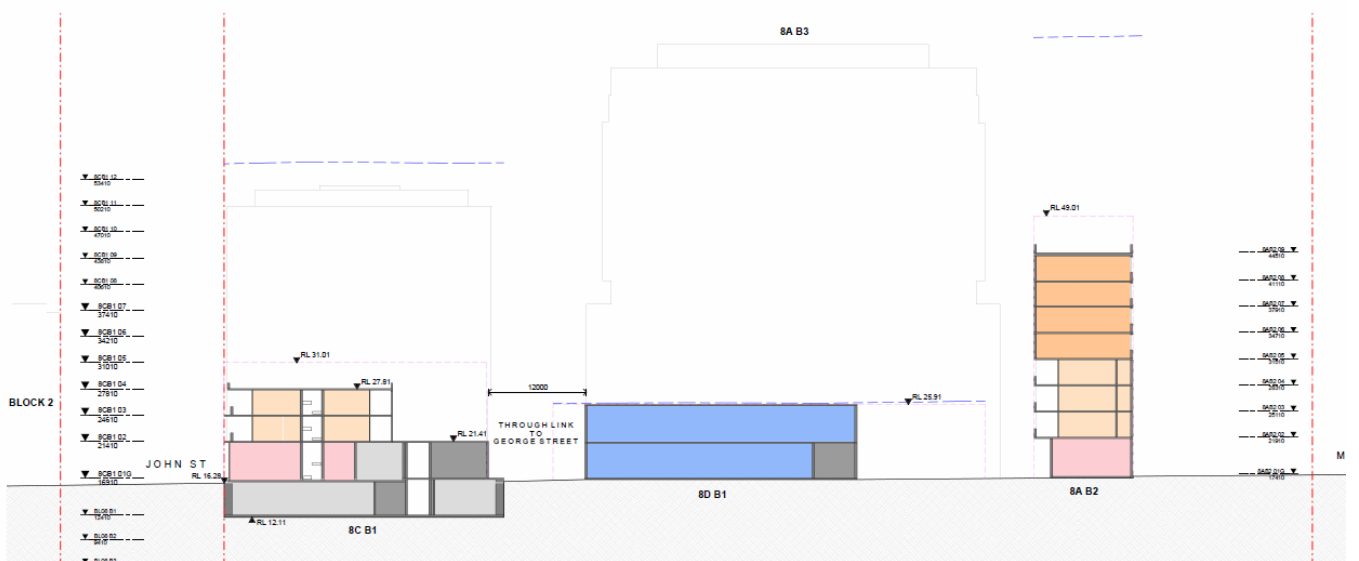


**Figure 56** Block 8 Ground Plane

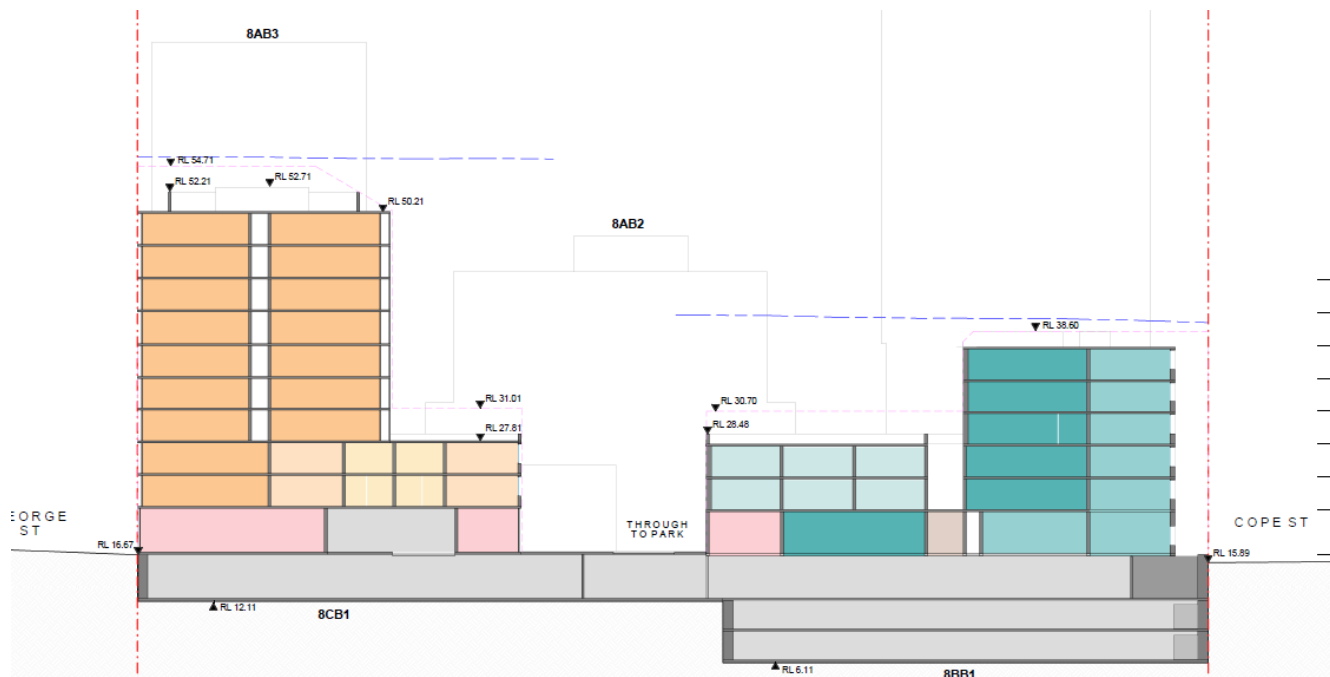
Source: Design Report prepared by SJB



**Figure 57** Block 8 Sections (8AB3 left, 8DD1 centre, 8AB1 right)  
 Source: Design Report prepared by SJB



**Figure 58** Block 8 Section (8CB1 left, 8DB1 centre, 8AB2 right)  
 Source: Design Report prepared by SJB



**Figure 59** Block 8 Sections (8CB1 left & 8BB1 right)

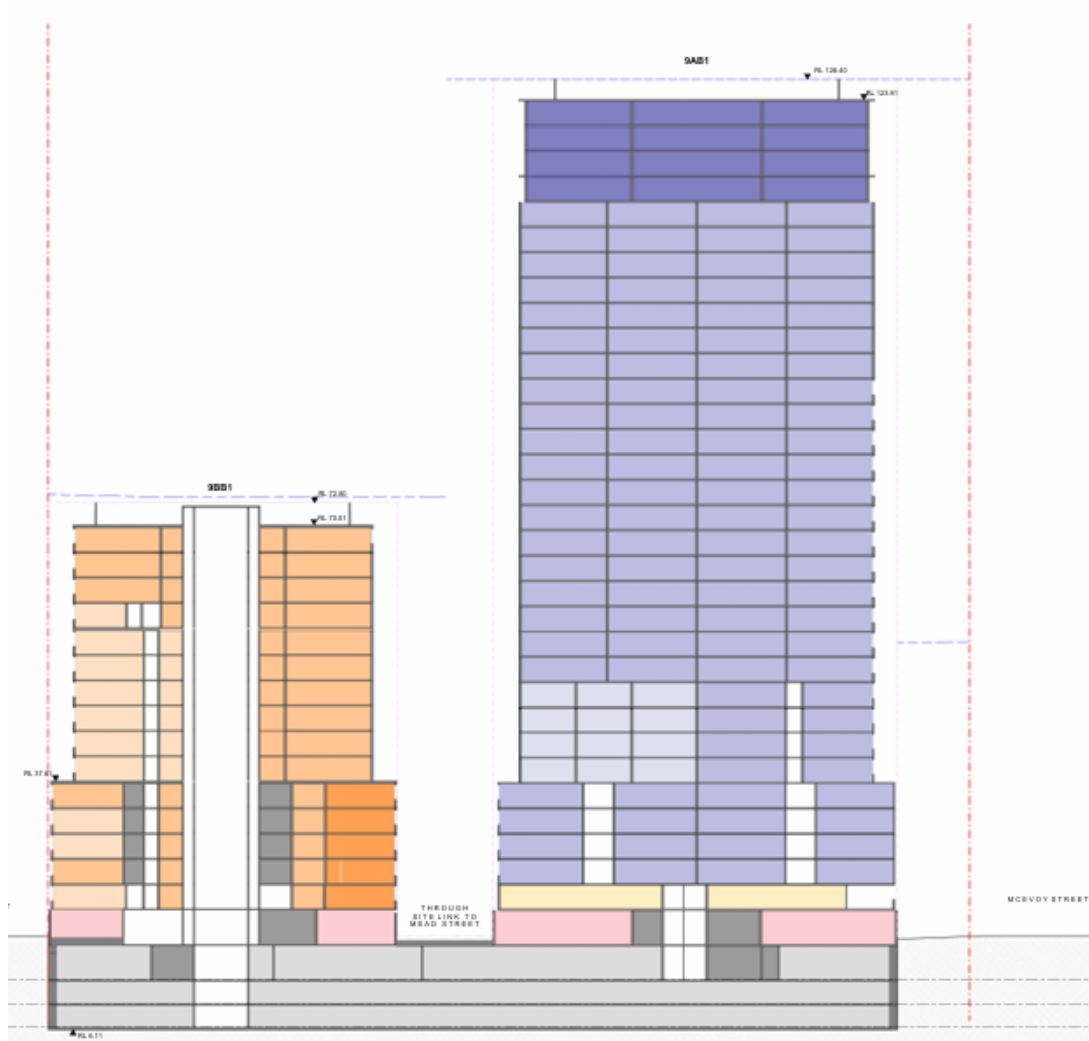
Source: Design Report prepared by SJB

## Block 9

Block 9 comprises two buildings, identified as 9AB1 and 9BB1, arranged to define active street edges along McEvoy Street, George Street and John Street.

Building 9AB1 ranges in height from 9 to 33 storeys and comprises market housing above a double loaded L-shaped podium, which reduces to a double loaded rectangular form from level 9. The tower form sits within the established concept envelope as depicted in **Figure 60**. The ground floor accommodates non-residential uses, including a supermarket and non-residential uses fronting McEvoy Street and George Street, reinforcing activation along key pedestrian routes and supporting the role of these streets within the precinct.

Building 9BB1 is a 16-storey residential building comprising social housing above a mixed-use podium. At ground level, non-residential uses are located at the corner of John Street and George Street, along the George Street frontage and the through-site link, reinforcing activation and surveillance along this internal pedestrian connection.



**Figure 60** Block 9 Section (9BB1 left & 9AB1 right)

Source: Design Report prepared by SJB

### Block 10

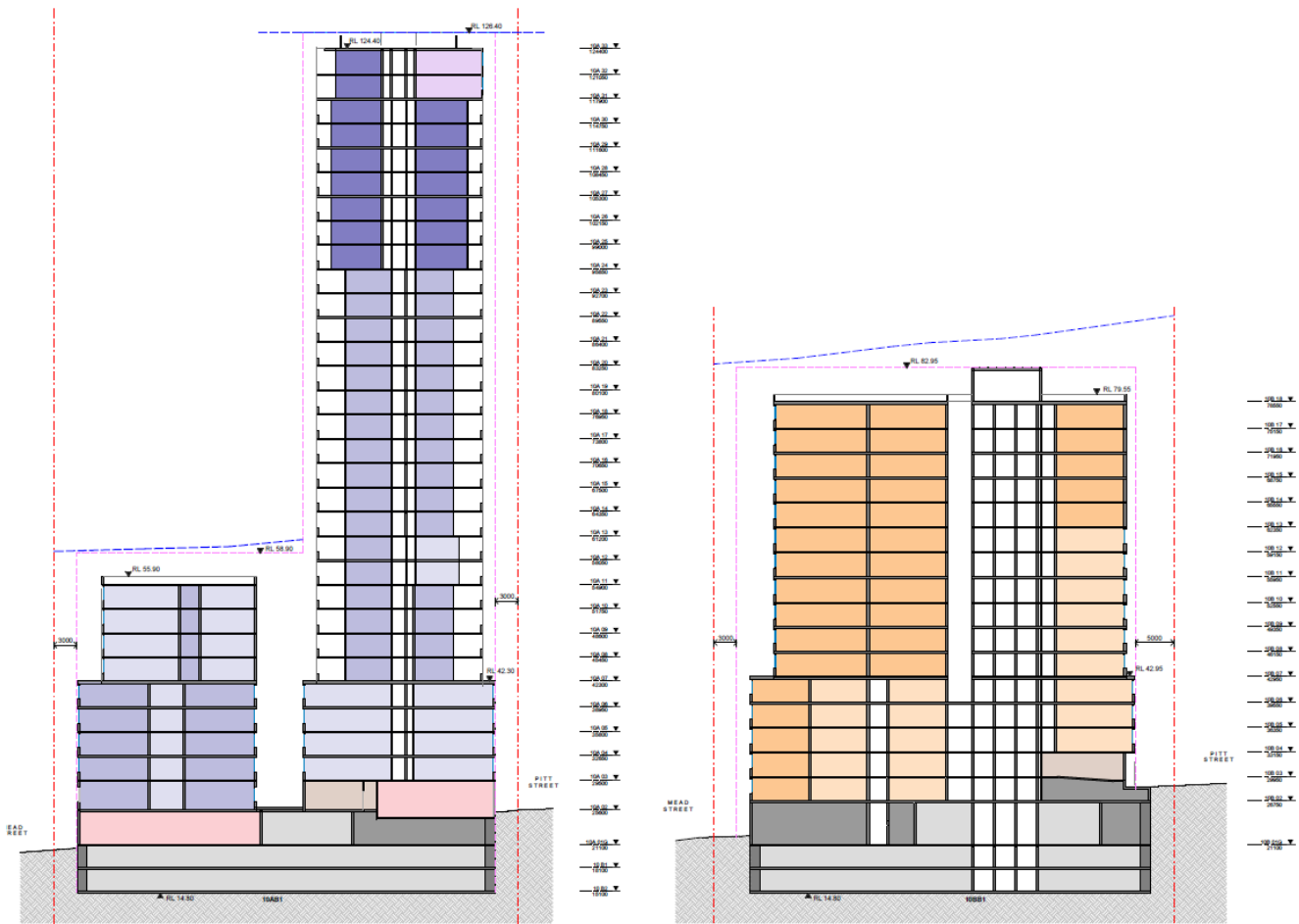
Block 10 comprises two buildings, identified as 10AB1 and 10BB1, arranged within a double-loaded L-shaped podium form that sits above a shared 3-level basement structure.

Building 10AB1 ranges in height from approximately 11 to 33 storeys and accommodates market housing above a mixed-use podium. The building form transitions vertically from a consistent podium height to a slender tower element, reducing bulk at upper levels and contributing to an appropriate scale transition within the precinct. The tower is fully contained within the approved concept envelope, as illustrated in **Figure 61**.

At ground level, retail uses within Building 10AB1 front Pitt Street, Mead Street and McEvoy Street, reinforcing active edges along key pedestrian routes and contributing to the vibrancy of the surrounding public domain. The podium form provides a strong street wall condition while allowing articulation and modulation to enhance visual interest and pedestrian-scale amenity.

Building 10BB1 ranges between 16 and 18 storeys and comprises social housing, delivering tenure diversity within the block. The building is expressed as a complementary but distinct form to 10AB1, with a clear podium-and-tower composition that aligns with the broader built-form strategy for Waterloo South. Non-residential uses are located at ground level fronting John Street, supporting activation along this frontage and reinforcing the role of John Street as a secondary pedestrian route.

Both buildings share a consistent 6-storey street wall, establishing a coherent podium datum across the block and reinforcing the street enclosure. Above this height, the buildings step and articulate to reduce perceived bulk and respond to surrounding streets and open spaces.



**Figure 61** Block 10 Section (10AB1 left & 10BB1 right)

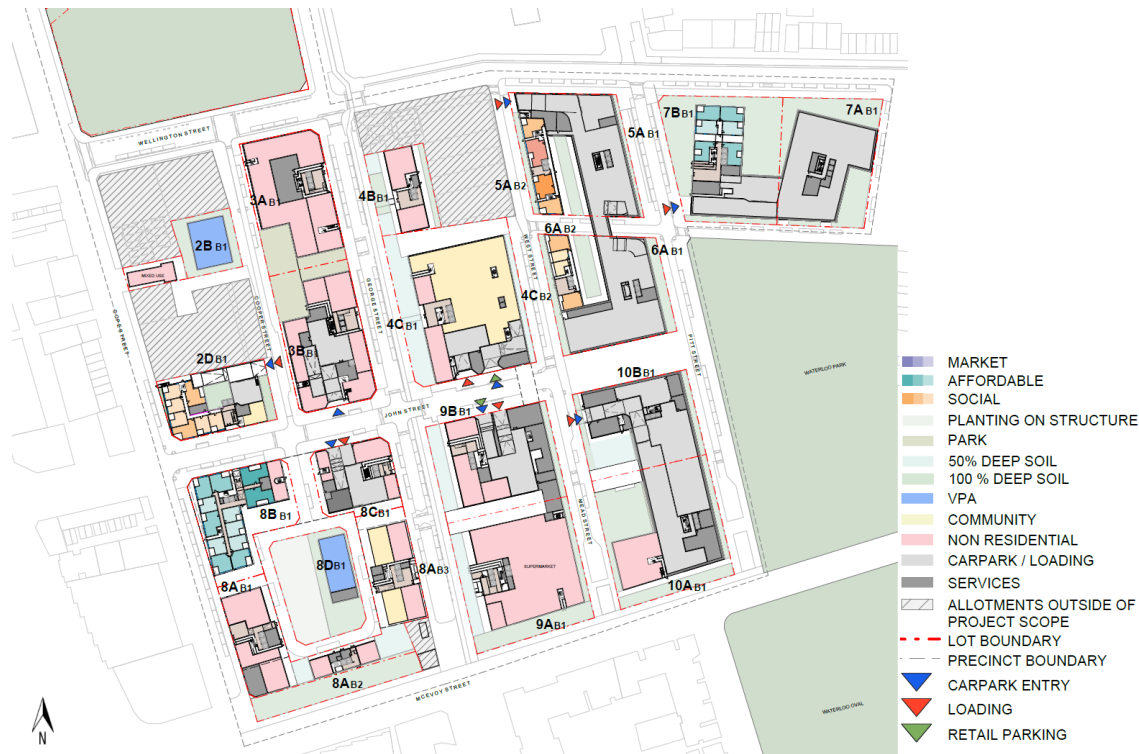
Source: Design Report prepared by SJB

### 6.3.3 Access and Parking

#### Vehicular site access and loading/ unloading

The reference scheme provides vehicular access to the site from Cooper Street, John Street, Mead Street, and Pitt Street, as described below and extracted in **Figure 62**:

- Residential vehicular access is provided to Buildings 2DB1, 3BB1, 8CB1, 4CB2, 9BB1, 5AB1, 7BB1, and 10BB1.
- Loading areas are provided within Buildings 2DB1, 8CB1, 4CB2, 9BB1, 5AB1, 7BB1, and 10BB1.
- Retail vehicular access is provided from John Street for Block 9.



**Figure 62** Access and loading arrangements

Source: Design Report prepared by SJB

### Car parking

The reference scheme prepared by SJB indicates a provision of approximately 1,500 parking spaces, demonstrating that the development can be accommodated within the maximum parking rates established by the LEP (refer to **Section 9.14** of the EIS). Basement parking is proposed underneath Blocks 2-10, with shared access provided in appropriate locations (refer to **Figure 63**). Notably all the on-site retail parking for the precinct will be delivered within Block 9 to support the supermarket tenancy. The detailed provision and allocation of parking will be determined at future detailed SSSA stages and will be informed by detailed traffic and transport assessments and the applicable planning controls at that time.



**Figure 63** Basement extent plans

Source: Design Report prepared by SJB

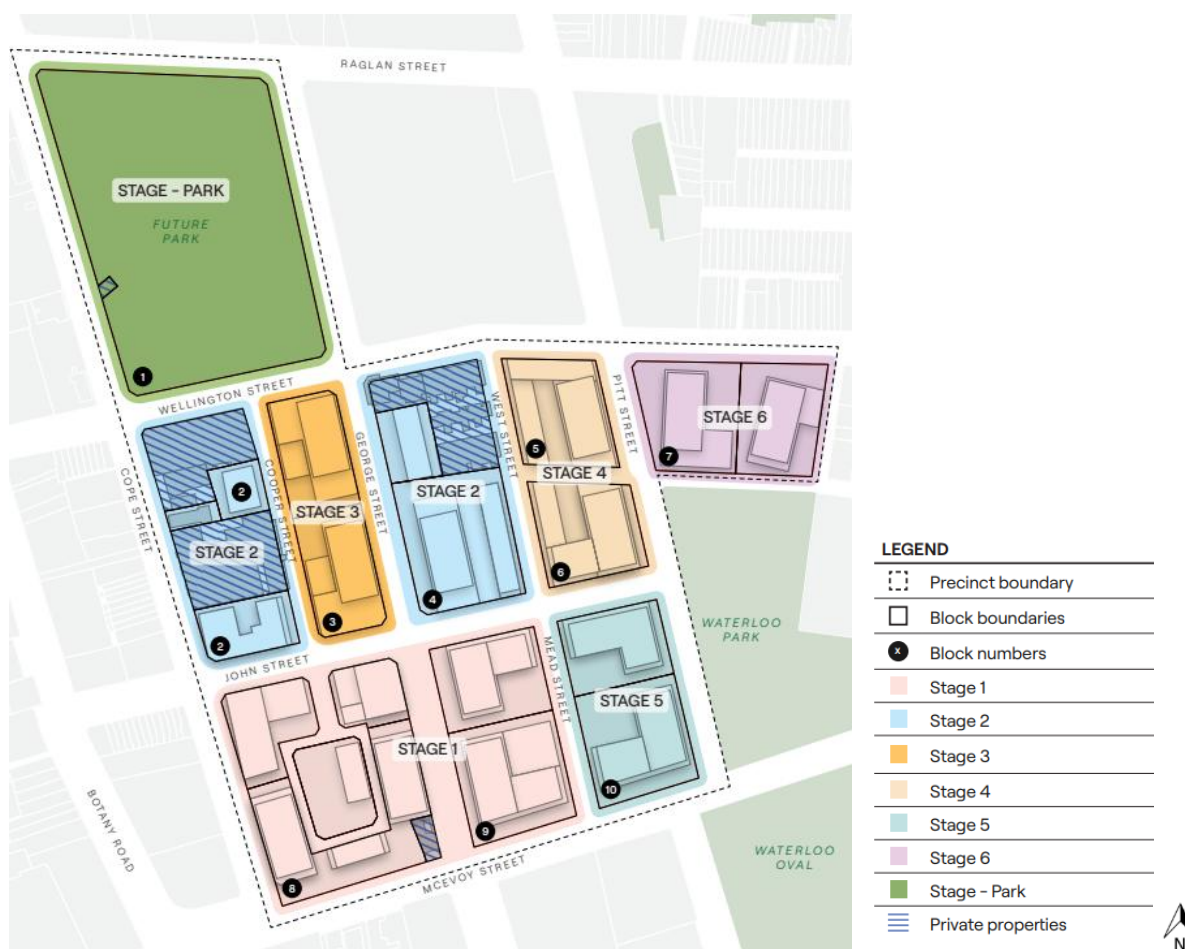
## 6.4 Indicative Staging and Land Dedication

The redevelopment of Waterloo South will be delivered through a staged approach across 10-15 years, reflecting the scale and complexity of the precinct and the need to manage transition for existing residents, infrastructure delivery and public domain outcomes.

Staging is intended to support the orderly redevelopment of the site, minimise disruption to existing communities, ensure safety, facilitate the progressive delivery of housing (including social and affordable housing), and enable timely provision of public open spaces, community facilities, and supporting infrastructure as required by the VPA.

As shown in the following figure, an indicative seven (7) stages are proposed to deliver the precinct, comprising six (6) built form stages, as well as one (1) stage which will encompass the delivery of the Village Green Park (known as “The Park”) (refer to **Figure 64**). Construction will begin in the south-west corner of the precinct along McEvoy Street and conclude at the eastern side of the precinct. The staged delivery of infrastructure is also proposed to support the progressive completion of the project. The proposed indicative staging strategy, including a description of the works intended to be completed within each stage is described in **Table 10**.

The extent of public domain upgrades, including but not limited to footpath embellishment, relate only to the land immediately adjacent to allotments owned by Homes NSW. A key aspect of the staging strategy is the delivery of the Block 1 park, prior to issue of an Occupation Certificate for at least 50 per cent of the GFA across the site.



**Figure 64** Indicative Staging Plan

Source: Design Report prepared by SJB

**Table 10** Indicative Development Staging and VPA commitments

Stage	Indicative Development Staging	Land Dedication / VPA commitments
Stage 1 – Blocks 8 & 9	Stage 1 comprises the redevelopment of Blocks 8 and 9 and establishes the foundation for the renewal of Waterloo South. Key components of Stage 1 include:	Stage 1 comprises the construction and delivery of key road infrastructure works surrounding Blocks 8 and 9, including upgrades to the eastern half of Cope Street, southern portion of John Street and full extent of George Street,

Stage	Indicative Development Staging	Land Dedication / VPA commitments
	<ul style="list-style-type: none"> <li>• Delivery of Blocks 8 and 9 as the first phase of redevelopment.</li> <li>• Establishment of George Street as the central north-south spine of the precinct, supporting movement, connectivity and early activation.</li> <li>• Early activation of George Street through ground-level retail and community uses, creating a safe, legible and weather-protected pedestrian link to the metro station and strengthening connections to Green Square.</li> <li>• Accelerated delivery of public open space, landscaping and stormwater infrastructure within Block 8, including deep soil zones and water-sensitive urban design measures.</li> <li>• Delivery of Blocks 8 and 9, including the Block 8 tower as a gateway building and landmark signalling the commencement of precinct transformation.</li> <li>• Provision of an anchor non-residential tenant in the early phase to support residents, workers and visitors and foster an active, walkable neighbourhood.</li> <li>• Stage 1 will deliver essential public domain, infrastructure and activation outcomes to support subsequent stages of development and establish a high-quality urban environment from the outset.</li> </ul>	<p>together with associated public domain improvements such as new footpaths.</p> <p>Public domain upgrades associated with Mead Street for the length of Block 9 (between McEvoy Street and John Street) are also proposed to be delivered in Stage 1.</p> <p>Stage 1 also proposes the delivery of Cooper Street South, to be dedicated to Council, and the establishment of East-West through-site links provided as easements.</p> <p>In addition, Stage 1 includes the dedication of community infrastructure and the delivery of the Block 8 public open space.</p>
<p>Stage 2 – Blocks 2 and 4</p>	<p>Stage 2 focuses on enabling development within the western and central portions of the precinct while utilising the existing street network and deferring areas requiring more complex coordination. Stage 2 includes:</p> <ul style="list-style-type: none"> <li>• Redevelopment of the Stage 2 blocks (Blocks 2 and 4). Block 2 is bounded by Cope Street, Wellington Street, John Street and Cooper Street, whilst Block 4 is located further east and is bound by George Street, Wellington Street, West Street and John Street as shown on the staging plan.</li> <li>• Use of the existing road network to facilitate construction works, minimising the need for early delivery of new streets or road realignments.</li> <li>• The community building within block 2D is to be delivered through consultation with City of Sydney.</li> <li>• Progressive extension of George Street activation through additional residential, retail and community uses.</li> <li>• Delivery of associated public domain works, landscaping and infrastructure necessary to support subsequent stages.</li> </ul>	<p>Stage 2 proposes the delivery of key public domain upgrades for the extent of development proposed within Blocks 2 and 4.</p> <p>This includes road improvements and footpath upgrades to the western extent of Cope Street adjacent the allotments subject to this proposal (i.e. excluding the privately owned lots) and similarly to adjacent the subject allotments along Cooper Street. Road widening and dedication, as well as improvements are also proposed as part of this stage for the western extent of Cooper Street that adjoins Block 3.</p> <p>Stage 2 includes road improvements and public domain upgrades to John Street and George Street along for the extents of Blocks 2 and 4. Public domain improvements are also proposed adjoining the Block 3 development site along West Street.</p> <p>This stage will also facilitate the delivery of the remaining community infrastructure to be dedicated to Council for community facilities.</p> <p>The continuation of the east-west through site link through Blocks 2 and 4, and provision of the link as an easement is also proposed as part Stage 2.</p>
<p>Stage 3 – Block 3</p>	<p>Stage 3 focuses on redevelopment of the Block 3 and will complete the central portion of the precinct and of the key east-west connection. The redevelopment of Stage 3 comprises the construction of Block 3 bound by Wellington Street, Cooper Street, Street, John Street and George Street.</p>	<p>Stage 3 comprises the delivery of necessary road and public infrastructure to support Block 3, including on the Wellington Street, George Street, and John Street frontages of the block. Footpath upgrades only are proposed for the extent of the site along Cooper Street as road widening and improvements on Cooper Street are proposed as part of Stage 2.</p> <p>The east-west through-site link proposed between Buildings 3A and 3B is also proposed to be constructed and provided as an easement in favour of Council as part of Stage 3.</p>

Stage	Indicative Development Staging	Land Dedication / VPA commitments
Stage 4 – Blocks 5 & 6	Stage 4 proposes the concurrent delivery of Blocks 5 and 6. Blocks 5 and 6 are bound by Wellington Street, Pitt Street, John Street and West Street.	<p>Stage 4 includes the new road extension for West Street, allowing for its connection to Wellington Street. Road widening is also proposed to the northern extent of West Street, improving the connection to John Street.</p> <p>The new road extension of Pitt Street is also proposed for the extent of Block 6. The extent of Pitt Street adjoining Block 6 is also proposed to be upgraded and improved.</p> <p>The public domain improvements, including but not limited to new and upgraded footpaths surrounding Blocks 5 and 6. The east-west pedestrian through-site link connecting West Street to Pitt Street between Blocks 5 and 6 is also proposed as part of Stage 4.</p>
Stage 5 – Block 10	Stage 5 focuses on redevelopment of the southern portion of the precinct and the strengthening of connections to adjacent open space. The redevelopment of Stage 5 comprises the construction of Block 10 and completion of the physical and visual interface with Waterloo Park, improving accessibility, landscape continuity and integration between the precinct and surrounding public open space.	<p>New sections of Pitt Street and Mead Street for the extent of Block 10 are proposed to be constructed and dedicated to Council in Stage 5.</p> <p>Stage 5 also comprises the extension and dedication of John Street to Council, between Mead Street to Waterloo Park.</p> <p>Public domain improvements are proposed as part of this stage, surrounding Block 10. The east-west pedestrian through-site link connecting Mead Street to Pitt Street between Buildings 10A and 10B is also proposed as part of Stage 5.</p>
Stage 6 – Block 7	Stage 6 represents the final built-form component of Waterloo South and enables coordinated integration with the future Waterloo Central renewal area. The redevelopment of Stage 6 comprises the construction of Block 7, in the easternmost portion of the precinct.	<p>Road upgrades and improvements to Pitt Street for the extent of Block 7 are proposed, as well as to Wellington Street.</p> <p>Public domain improvements, including new and upgraded footpaths are also proposed surrounding Block 7 as part of this development Stage.</p>
The Park - Block 1	<p>This stage delivers the principal public open space within the precinct. This stage comprises the delivery of the Village Green (future park), and landscape works and associated public domain infrastructure. The design of the public park will be undertaken in collaboration with the City of Sydney.</p> <p><i>* The park is required to be delivered prior to the occupation of 50% of the total GFA across the precinct. As such, the park is not to be delivered as the last stage, but in advance of the occupation of 50% of the residential GFA across the precinct.</i></p>	<p>This stage includes embellishment and dedication of the remaining public open space required by the VPA (approximately 20,000m<sup>2</sup>).</p> <p>This stage also includes road upgrades to Raglan Street, George Street, Wellington Street and Cope Street, and public domain works, including new and upgraded footpaths surrounding Block 1.</p>

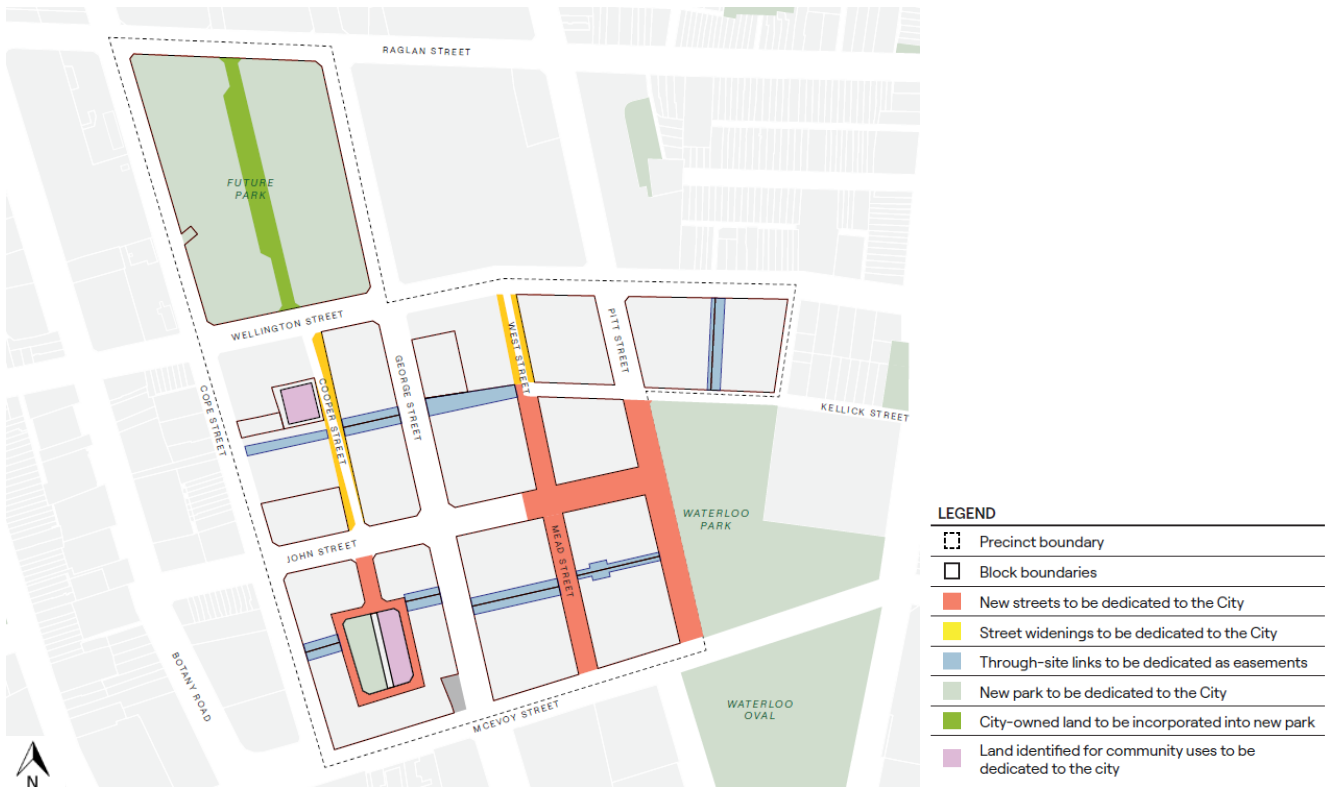
As outlined in the above table, the proposed infrastructure, public open spaces, and community facilities will be delivered across the site in a staged manner, consistent with the delivery of the rest of the precinct. The indicative staging plan has been informed by the requirements for the delivery of public benefits as committed in the executed VPA, as outlined in **Table 11** below.

**Table 11** Timing of VPA Delivery

Public Benefit	VPA Timing	Concept Timing
<b>Land Dedications</b>		
<b>New Road Reserves</b>	<p>For each relevant phase, prior to the first Occupation Certificate in relation to a building of that phase to ensure provision of:</p> <ul style="list-style-type: none"> <li>Entire street frontage of each building site</li> <li>Pedestrian and vehicle access to each site</li> </ul>	<p><u>New Roads</u> Stage 1, Stage 4 and Stage 5</p> <p><u>Road Widening</u> Stage 2 and Stage 4</p>

Public Benefit	VPA Timing	Concept Timing
<b>Public Open Space</b>	Prior to the issue of an Occupation Certificate for a building, or any part of a building where the occupation and use of at least 50% of the GFA of the development will be authorised as a result of the certificate.	Stage 1 and The Park
<b>Community Facilities</b>	Prior to the issue of an Occupation Certificate for a building, or any part of a building where the occupation and use of at least 75% of the GFA of the development will be authorised as a result of the certificate.	Stage 1 and Stage 2
<b>Developer Works</b>		
<b>Embellishment of Public Open Space</b>	For each relevant phase, prior to the first Occupation Certificate in relation to a building of that phase to ensure provision of: <ul style="list-style-type: none"> <li>Entire street frontage of each building site</li> <li>Pedestrian and vehicle access to each site</li> </ul>	Stage 1 and The Park
<b>Community Facilities</b>	Prior to the issue of an Occupation Certificate for a building, or any part of a building where the occupation and use of at least 50% of the GFA of the development will be authorised as a result of the certificate.	Stage 1 and Stage 2
<b>Essential Infrastructure - Embellishment of Road Reserves</b>	For each relevant phase, prior to the first Occupation Certificate in relation to a building of that phase to ensure provision of: <ul style="list-style-type: none"> <li>Entire street frontage of each building site</li> <li>Pedestrian and vehicle access to each site</li> </ul>	Completed at each individual stage

As outlined in the table above, the VPA includes a requirement to dedicate land across the precinct. A preliminary subdivision plan is included within the concept SSDA at **Appendix H** which clearly outlines the new lot boundaries proposed across the precinct to enable this land dedication to occur in accordance with the requirements of the VPA. The preliminary subdivision plan is consistent with the Land Dedication Plan provided below at **Figure 65**.



**Figure 65** Land Dedication Plan

Source: Design Report prepared by SJB

## 6.5 Precinct-wide Strategies

Approval is also sought for the following strategies and management plans which will inform and underpin future stages of the development.

### 6.5.1 Design Excellence Strategy

A Design Excellence Strategy (DES) has been prepared by Beam Planning to establish the framework through which design excellence will be delivered across Waterloo South. The Strategy applies at a precinct-wide level and will guide future detailed State Significant Development Applications to ensure consistently high-quality architectural, urban design and public domain outcomes.

As the largest social and affordable housing project in Australia, the redevelopment of Waterloo South presents a significant opportunity to demonstrate best practice in the delivery of mixed-tenure housing. The concept SSDA establishes a robust design excellence framework that seeks to set a new benchmark for inclusive, high-quality and efficiently delivered urban renewal.

#### Statutory Context

Clause 6.21C of the Sydney LEP 2012 requires development to exhibit design excellence. The concept SSDA has been prepared having regard to this requirement and establishes the parameters and processes through which design excellence will be achieved and assessed at future stages. The concept SSDA does not seek any additional floor space as a design excellence bonus, with design excellence outcomes to be delivered within the approved development capacity.

The Design Excellence Strategy has been prepared with reference to:

- the City of Sydney Competitive Design Policy;
- the Government Architect NSW Design Competition Guidelines (September 2023);
- the NSW State Design Review Panel Terms of Reference;
- the Government Architect NSW Advisory Note for Homes NSW Project Teams; and
- the Design Excellence Competition Exemption Pathway for residential SSDAs

#### Design Excellence Objectives

The Design Excellence Strategy has been informed by, and responds to, the objectives set out in Section 8.12 of the 2022 Design Guide. These objectives underpin the proposal and will guide future design excellence processes, including:

- ensuring a range of building heights, typologies and architectural expressions that provide diversity and visual interest while contributing to a cohesive precinct character;
- achieving culturally appropriate building design that responds to a diverse range of housing needs, including housing for Aboriginal and Torres Strait Islander people;
- promoting architectural variety across development blocks to enrich the public realm and enhance legibility;
- delivering high-quality façade design and materials across all buildings, with particular emphasis on tall buildings, corner sites and interfaces with parks and public open space;
- ensuring design excellence is achieved consistently across all tenures, including social, affordable and market housing;
- integrating landscape and building design to deliver a diverse range of spaces, experiences and environmental outcomes; and
- achieving excellent outcomes in relation to solar access, wind comfort, acoustic amenity, tree retention and overall environmental performance.

Design excellence at future stages will be assessed having regard to the concept SSDA, Design Excellence Strategy and relevant statutory and policy requirements, including clause 6.21C of the Sydney LEP 2012. Detailed proposals will be required to demonstrate excellence in built form quality, architectural expression, amenity, sustainability, integration with landscape and public domain, and responsiveness to Country, consistent with the objectives set out in this Strategy.

#### Design Excellence Approach

The approach to design excellence for Waterloo South adopts a holistic, precinct-wide framework, supported by tailored design excellence processes that respond to the scale, complexity and staging of the redevelopment.

The concept SSDA establishes the overarching-built form, land use and public domain parameters within which design excellence will be pursued. Future detailed SSDAs will be required to demonstrate consistency with the approved concept proposal and Design Excellence Strategy, and to deliver high-quality outcomes through appropriate competitive design processes, design review and independent evaluation, as relevant to each development stage.

This approach ensures that design excellence is embedded from the earliest stages of planning and carried through to detailed design and delivery, while allowing flexibility to respond to evolving community needs, technical requirements and architectural innovation over time. Compliance with the Design Excellence Strategy will be a requirement of future detailed SSDAs.

It is to be noted in November 2025, DPHI announced that to streamline planning processes and accelerate the delivery of new housing, a design competition exemption pathway had been introduced for State Significant Development SSD housing projects. To request a design competition exemption, Alternative Design Excellence Strategy's will be prepared at detailed application stages which will outline how the project meets the eight criteria required for the exemption. Homes NSW and Stockland will seek to utilise this exemption pathway for applicable future detailed stages of the redevelopment of Waterloo South.

### **Design Excellence Process and Governance**

The Design Excellence Strategy establishes a clear, staged and proportionate design excellence process for Waterloo South, as illustrated in **Figure 66**. The process is tailored to reflect the scale, complexity and mixed-tenure nature of the redevelopment, while ensuring consistently high-quality outcomes across all building types and public domain elements.

At the concept application stage, a direct appointment model has been adopted to establish a strong and coherent design foundation for the precinct. This includes the appointment of a concept Architect, First Nations Architect/Advisor, and concept Landscape Architect to lead the preparation of the concept proposal, including the concept design and the overarching public domain and landscape framework. This approach ensures early integration of urban design, architecture, landscape and Country-led principles and provides a robust design framework to guide future stages.

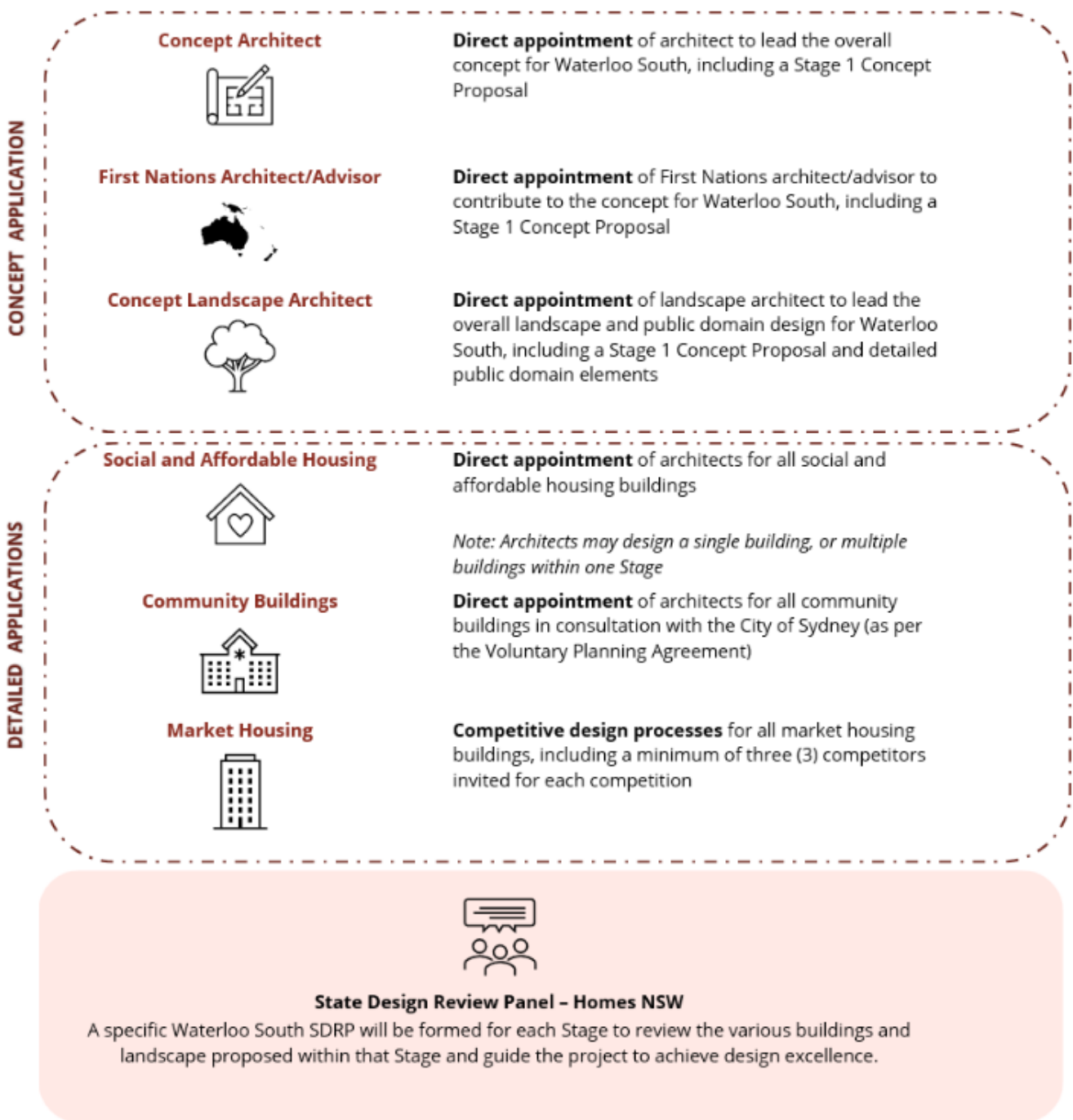
At the detailed application stage, the design excellence process differentiates between development typologies to ensure an equitable and appropriate approach across tenures as described below:

- Social and affordable housing buildings will be designed by directly appointed architects, recognising the need for continuity, efficiency and delivery certainty while maintaining high architectural quality. Architects may be appointed to design single buildings or multiple buildings within a stage, subject to review through the design excellence process.
- Community buildings will also be designed through direct appointment, with design development undertaken in consultation with the City of Sydney, consistent with the Voluntary Planning Agreement and broader civic objectives.
- Market housing buildings will be subject to competitive design processes, with a minimum of three competitors invited for each competition, in accordance with the City of Sydney Competitive Design Policy and the Government Architect NSW Design Competition Guidelines, unless an exemption to require a design competition has been granted.

The proposal will utilise the State Design Review Panel (SDRP) - Homes NSW process for design review at each stage for all residential tenures unless otherwise agreed with Homes NSW, GANSW and the developer. The Homes NSW SDRP pathway is specifically intended to support Homes NSW projects and provides independent design advice and guidance to ensure proposals demonstrate design excellence, respond appropriately to the concept SSDA and Design Excellence Strategy, and deliver consistent outcomes across the precinct.

This structured and transparent approach ensures that design excellence is embedded at all stages of redevelopment, achieves equitable design quality across all housing tenures, and satisfies the requirements of clause 6.21C of the Sydney LEP 2012, while providing flexibility to respond to staged delivery and future detailed design.

Further detail on the approach to achieving design excellence is provided in **Section 9.1** of this EIS and the Design Excellence Strategy attached at **Appendix N**.



**Figure 66** Design Excellence Framework  
 Source: Design Excellence Strategy prepared by Beam Planning

**6.5.2 Remediation Strategy**

An Overarching Remedial Action Plan (O-RAP) has been prepared by JBS&G Australia Pty Ltd to support the staged redevelopment of Waterloo South. The O-RAP establishes a precinct-wide remediation framework to manage areas of fill material impacted by contaminants associated with historical site use, primarily within shallow surface layers.

The strategy adopts an on-site containment approach and provides a consistent methodology for remediation, validation and contingency measures across the life of the project. Stage-specific Remedial Works Plans will be prepared and implemented as part of future detailed applications to ensure land is made suitable for its intended use and that contamination-related risks to human health and the environment are appropriately managed, in accordance with relevant NSW contaminated land guidelines and legislation. This is further detailed in **Section 9.7** of the EIS.

### 6.5.3 Infrastructure Delivery Strategy

An Infrastructure and Staging Plan has been prepared by WScE to outline the indicative staging and coordinated delivery of essential infrastructure across the precinct, including potable water, wastewater, stormwater, electrical and communications utilities.

The plan identifies key infrastructure strategies to support future redevelopment, including the reuse of existing infrastructure where feasible, targeted upgrades to ageing water and sewer networks, staged stormwater management incorporating on-site detention, relocation of electrical assets underground with provision for new substations, and protection of major telecommunications infrastructure.

The following meetings were held to inform the infrastructure delivery strategy:

- Stockland and Homes NSW met with Sydney Water on 09 March 2026 to discuss the proposed concept master plan and staging, including capacity and expectations relating to stormwater, potable water, fire life safety connections and wastewater infrastructure. Feedback from this meeting will inform the preparation of the staging of the development and future detailed development applications.
- Stockland and Homes NSW met with Telstra on 25 March 2026 to discuss the proposed concept master plan and staging in particular regarding the existing telecommunications infrastructure located adjacent to Block 8 (Stage 1) adjacent to the existing heritage listed electrical substation on the corner of George St and McEvoy St. Feedback from this meeting will inform the preparation of the staging of the development and future detailed development applications.

Stockland and Homes NSW are also working to arrange a meeting with Jemena, Ausgrid and other communication carriers in the Waterloo South area to discuss the proposed development to inform the preparation of the staging of the development and future detailed development applications.

#### Potable water

The proposed development will require potable water connections to service each lot, one for potable water and one for fire services. The conceptual potable water system is outlined below:

- a new potable water main (DN250) is proposed along John Street and Pitt Street to service parts of the development lot. This water main will support fire service flows and reduce the size of building tanks. The DN250 potable water main will be connected to and supplied via the existing DN250 water main on Wellington Street within the Centennial Park pressure zone. The existing potable water reticulation mains in the precinct range from DN100 to DN150, and some sections will be disused as part of the works.
- One local lead-in connection will be provided from either:
  - Existing trunk infrastructure where Sydney Water has confirmed sufficient capacity, or;
  - One local lead-in connection from the proposed new DN250 reticulation main along John Street and Pitt Street infrastructure.
- As most of the proposed alignment is located within the road reserve and footpath areas, the water mains will generally be installed via conventional open trenching. A minimum cover of 750mm (depth to obvert) will be provided in trafficable areas, and 450mm in non-trafficable areas, in accordance with Table 7.2 of WSA 03-2011-3.1 Water Supply Code of Australia (Sydney Water Edition 2014, Version 3.1).
- Firefighting requirements: Hydrants will generally be positioned at maximum 50m intervals to comply with CBD firefighting standards. Where site constraints or design considerations make this spacing impractical, alternative solutions may be explored in consultation with Sydney Water and subject to authority approval.

#### Recycled Water

The following water conservation strategy is proposed for Waterloo South:

- Rainwater harvesting in each block, primarily serving retail areas and then irrigation, reducing reliance on mains water for landscaping.
- Water-efficient fixtures in all apartments to minimise consumption.

#### Wastewater

The proposed development will require wastewater connections for each block, as described below:

- New DN300 sewer mains are proposed to be installed on John Street and parts of Pitt Street. A short section of DN225 sewer main will be upgraded to a DN300 on John Street to service Block 2.

- Wastewater lead-in connections to each block will be configured to provide either:
  - One local lead-in connection from existing trunk sewer infrastructure where Sydney Water has confirmed sufficient capacity (i.e., DN600 along Cope Street, DN450 along George Street, and DN400 along McEvoy Street), or
  - One local lead-in connection from the proposed new DN300 sewer mains along John Street and Pitt Street infrastructure, as applicable.
- Maintenance holes (MHs): All new MHs will be DN1200 and constructed in accordance with Sydney Water's Deemed-To-Comply (DTC) drawings. Structural assessments will be required for existing MHs that will be intercepted by the new network.
- The proposed sewer network will be designed in accordance with Sydney Water's sewerage code.

### Stormwater

Stormwater infrastructure is proposed for the site as outlined in **Section 5.5.5**.

### Gas

No gas infrastructure is proposed across the precinct as all buildings are proposed to be fully electric. As part of the infrastructure delivery strategy, existing gas infrastructure will be capped at the block boundaries whilst existing infrastructure outside of the block boundaries will be retained.

All gas assets can be sealed at the individual development block boundary following discussion with Jemena. An abolishment application with Jemena will need to be lodged once all the existing individual apartment meters have been identified and are able to verify which Energy Retailer is allocated to each account.

### Electrical utilities

The diversified electrical maximum demand of the proposed Waterloo South development is estimated at approximately 14.5 MVA. Previous consultation with Ausgrid indicates that sufficient spare capacity is available within the existing high-voltage network servicing the precinct, including the Zetland Zone Substation. Initial stages of the development are expected to connect to the existing 11 kV network within and surrounding the site, subject to detailed Ausgrid approval. In the longer term, the ultimate power requirements of the precinct are anticipated to be supplied from the Zetland Zone Substation via new and/or augmented 11 kV feeders, with a general intent to utilise existing spare conduits and network allocations where practicable.

As part of the redevelopment, existing overhead Ausgrid assets within the Waterloo Estate (South) precinct are proposed to be removed and relocated underground. This will be accompanied by the installation of new Ausgrid steel columns and LED street lighting to replace ageing infrastructure.

Electrical works required to support construction and occupation of the development are proposed to be delivered in three phases: early establishment works, temporary and permanent power works, and decommissioning works. These phases will align with the overall project staging and anticipated timing of temporary and permanent power demand.

Temporary and permanent power supply to the development will be provided via Ausgrid external substations, with some blocks also incorporating community batteries. These assets will be located within private domains and site link areas. Temporary Builder Supply for each block is expected to be provided from at least one newly constructed and energised permanent external substation, which will initially support construction activities and subsequently be converted to permanent supply as buildings near completion.

### Communication Utilities

The site is comprehensively serviced by an existing pit and conduit network owned by NBN Co or leased from Telstra by NBN Co in its role as the Government's infrastructure provider of last resort. This network comprises a series of local networks that directly service existing properties via lead-in connections, as well as higher-capacity trunk networks that convey transit fibre to support distribution across the precinct.

In relation to the proposed redevelopment staging, the existing trunk networks are generally intended to remain in place and are expected to provide sufficient capacity and service levels to accommodate the new development. Local networks that currently service buildings proposed to be demolished or built over are anticipated to become redundant and may be decommissioned and relinquished, subject to agreement with the relevant authorities.

All other telecommunications assets are proposed to remain in situ, subject to detailed coordination and approvals from the relevant telecommunications providers.

### 6.5.4 Tree Removal and Retention Strategy

The proposed development establishes a precinct-wide Tree Removal and Retention Strategy that forms part of the overarching landscape and public domain framework for the redevelopment of Waterloo South. The strategy is intended to guide future stages of development, ensuring that existing tree assets are appropriately considered while facilitating the delivery of a high-quality, resilient urban forest aligned with the vision for the precinct.

An Arboricultural Impact Assessment prepared by TMS has informed the proposed approach to tree removal and retention across the precinct. At the concept stage, the proposal anticipates the removal of approximately 236 trees and the retention of approximately 304 trees (refer to **Figure 67**).

Tree removal is primarily associated with the delivery of new buildings, streets, utilities and public open spaces. The strategy prioritises the retention of higher-value trees where feasible and integrates retained trees into public open spaces, street corridors and landscaped areas to support long-term canopy outcomes.

Tree removal will be offset through replacement planting and the delivery of additional canopy trees as part of future stages of development. The concept proposal demonstrates that the proposed development is capable of achieving a minimum tree canopy cover of 50 per cent across the precinct at maturity, consistent with strategic canopy targets. The reference scheme confirms that this target is achievable through a combination of retained and generous deep soil zones. See **Section 9.6** for further assessment.



**Figure 67** Tree Retention Plan  
Source: Arboricultural Report prepared by TMS

### 6.5.5 Stormwater Management and Drainage Strategy

The proposed development seeks approval for a precinct-wide water cycle management approach to manage stormwater quantity and quality associated with the staged redevelopment of Waterloo South.

Stormwater generated within development blocks will be collected and conveyed via a coordinated internal drainage network and discharged to the downstream public stormwater system. On-site detention will be incorporated within individual development blocks to regulate post-development discharge rates and ensure that stormwater flows do not exceed pre-development conditions.

The public domain, including streets and public open spaces, will be designed to safely accommodate overland flow paths during major rainfall events. The proposed arrangement maintains compatibility with the surrounding drainage network and avoids adverse flooding impacts on adjacent properties.

Stormwater quality treatment will be provided through integrated treatment measures within development blocks to meet applicable performance requirements prior to discharge from the site. The water cycle management approach will be coordinated with the public domain, landscaping and built form to support urban cooling, tree health and overall amenity outcomes across the precinct.

Detailed design, hydraulic modelling and final infrastructure sizing will be undertaken as part of future applications, consistent with the approved concept SSDA and relevant authority requirements. Further detail is provided in the Stormwater Management Strategy at **Appendix U** and **Section 9.12** of the EIS.

### 6.5.6 Flood Management Strategy

The proposed development seeks consent for a precinct-wide Flood Management Strategy to guide the staged redevelopment of Waterloo South. The strategy establishes an overarching framework for managing flood risk across the site, having regard to existing flood behaviour, site topography and downstream constraints within the Alexandra Canal catchment.

The Flood Management Strategy is informed by a site-wide Flood Impact and Risk Assessment prepared to support the concept SSDA, which assesses flood behaviour across the full range of flood events, including up to the Probable Maximum Flood and relevant climate change scenarios.

The strategy is based on maintaining existing flood behaviour, protecting new development through appropriate flood planning levels, and ensuring that development does not result in adverse flood impacts on surrounding properties.

Key principles of the proposed flood management approach include maintaining overall road levels and overland flow paths, integrating local drainage improvements without materially altering flood behaviour, locating building entrances and habitable spaces above applicable flood planning levels, and adopting a shelter-in-place approach to flood evacuation where appropriate.

Further detail is provided in the Flood Impact and Risk Assessment at **Appendix AA** and in **Section 9.13** of the EIS.

### 6.5.7 Public Art Strategy

A Preliminary Public Art Strategy has been prepared by UAP (refer to **Appendix L**) to support the staged redevelopment of Waterloo South. The Public Art Strategy establishes the curatorial vision for public art across the precinct which will underpin future provisions or public art at detailed design stages. The proposed budget for public art is established as 1 per cent of construction cost of the market residential GFA.

The curatorial vision for the site is proposed as “Home is Community”. The recommended artwork activations across the precincts are outlined within the Public Art Strategy and further discussed in **Section 9.6.3** of the EIS.

### 6.5.8 Sustainable Development Strategy

The proposed Waterloo South development incorporates a comprehensive Sustainable Development framework to guide planning, design, construction and long-term operation of the precinct. The ESD approach is consistent with the principles of ecologically sustainable development under *the Environmental Planning and Assessment Regulation 2021* and responds to the SEARs, *the State Environmental Planning Policy (Sustainable Buildings) 2022*, and the revised Design Guide.

Key sustainability commitments include reducing upfront embodied carbon, improving operational energy efficiency, transitioning to fully electrified building services, and enabling precinct-scale renewable energy generation. The project targets a minimum 40 per cent reduction in upfront embodied carbon compared with a reference case and seeks to supply 100 per cent renewable electricity for post-construction operations, consistent with the proponent's broader decarbonisation objectives.

Water efficiency will be achieved through BASIX-compliant measures, including water-efficient fixtures and rainwater harvesting for irrigation and selected non-potable uses, reducing reliance on potable water supplies. Waste minimisation principles will be embedded through material efficiency, construction waste management, and long-term operational waste strategies aligned with City of Sydney requirements.

The redevelopment will also prioritise climate resilience and liveability through passive design, urban heat mitigation, high-quality public open space, active transport integration and enhanced residential amenity. Cultural sustainability is addressed through early and ongoing engagement with First Nations representatives and implementation of a Designing with Country framework that informs landscape, public realm and precinct identity.

Performance against ESD objectives will be supported by recognised third-party benchmarks and rating tools, including a target 6 Star Green Star Communities rating for the precinct, 5 Star Green Star Buildings ratings for residential buildings, compliance with BASIX and NatHERS, and NABERS Energy and Water ratings for relevant non-residential uses. Detailed building-level compliance will be addressed in future development applications consistent with the approved concept framework.

The sustainability strategy is further discussed in **Section 9.18** of the EIS.

## 7.0 Statutory Context

This section provides an assessment of the matters the consent authority must consider when determining a development application under Section 4.15(1) of the EP&A Act.

### 7.1 Power to Grant Approval

**Table 12** identifies the legal pathway under which consent for the project is sought, its permissibility and any other approvals that are required to carry out the project.

**Table 12** Power to grant approval

Consideration	Assessment
<b>Declaration of SSD</b>	The proposal is for the purposes of a housing development, carried out by or on behalf of the Land and Housing Corporation (LAHC), with an estimated development cost (EDC) of more than \$30 million and will provide at least 75 dwellings and is therefore declared as State Significant Development under Section 26 of Schedule 1 of the Planning Systems SEPP.
<b>Consent authority</b>	Pursuant to Section 4.5(a) of the EP&A Act, the Minister for Planning and Public Spaces, or their delegate will be the consent authority for the application.
<b>Crown Development</b>	<p>The proposed development is classified as Crown development under clause 294 of the <i>Environmental Planning and Assessment Regulation 2021</i> (EP&amp;A Regulation).</p> <p>Clause 294 prescribes the following persons as the Crown for the purposes of section 4.32(2)(a) of the EP&amp;A Act:</p> <ul style="list-style-type: none"> <li>• a public authority (other than a council),</li> <li>• an Australian university within the meaning of the Higher Education Act 2001,</li> <li>• a TAFE establishment within the meaning of the Technical and Further Education Commission Act 1990, and</li> <li>• a Crown cemetery operator within the meaning of the Cemeteries and Crematoria Act 2013.</li> </ul> <p>NSW Land and Housing Corporation is the applicant for the proposed development . LAHC forms part of the Department of Communities and Justice, which is a public service agency. Under section 1.4 of the EP&amp;A Act, a public authority includes a public service agency. Accordingly, LAHC qualifies as a public authority for the purposes of the EP&amp;A Act, and the proposed development constitutes Crown development.</p> <p>As a result, section 4.33 of the EP&amp;A Act applies to the determination of the application. Section 4.33 provides that a consent authority (other than the Minister):</p> <ul style="list-style-type: none"> <li>• must not refuse consent to a Crown development application except with the approval of the Minister; and</li> <li>• must not impose conditions on its consent to a Crown development application except with the approval of the applicant or the Minister.</li> </ul>

### 7.2 Permissibility

The proposed development is entirely permissible with consent, as detailed in **Table 13** below.

**Table 13** Permissibility of the proposed development

Consideration	Assessment
<b>Zoning</b>	The proposal is located on land which is subject to the Sydney LEP 2012. The site is zoned part E1 Local Centre, MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure. These zones permit a broad range of land uses to support mixed development. The development is permitted with consent in these zones as confirmed below.
<b>Proposed uses</b>	The proposal is defined as a “mixed use development” under the Standard Instrument meaning “a building or place comprising 2 or more different land uses”. The mixed-use development will contain the following land uses:

Consideration

Assessment

- Residential accommodation - **residential accommodation** means a building or place used predominantly as a place of residence, and includes any of the following—
  - Residential flat buildings
  - Shop top housing
- Commercial premises - **commercial premises** means any of the following—
  - business premises,
  - office premises,
  - retail premises - **retail premises** means a building or place used for the purpose of selling items by retail, or hiring or displaying items for the purpose of selling them or hiring them out, whether the items are goods or materials (or whether also sold by wholesale), and includes any of the following—
    - Food and drink premises
    - Shops means premises that sell merchandise such as groceries, personal care products, clothing, music, homewares, stationery, electrical goods or the like or that hire any such merchandise, and includes a neighbourhood shop and neighbourhood supermarket, but does not include food and drink premises or restricted premises.
- Community facilities - **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.
- Recreation area - **recreation area** means a place used for outdoor recreation that is normally open to the public, and includes -
  - a children’s playground, or
  - an area used for community sporting activities, or
  - a public park, reserve or garden or the like,
 and any ancillary buildings, but does not include a recreation facility (indoor), recreation facility (major) or recreation facility (outdoor).
- Recreation facility - **recreation facility (indoor)** means a building or place used predominantly for indoor recreation, whether or not operated for the purposes of gain, including a squash court, indoor swimming pool, gymnasium, table tennis centre, health studio, bowling alley, ice rink or any other building or place of a like character used for indoor recreation, but does not include an entertainment facility, a recreation facility (major) or a registered club.
- recreation facility (major) - **recreation facility (major)** means a building or place used for large-scale sporting or recreation activities that are attended by large numbers of people whether regularly or periodically, and includes theme parks, sports stadiums, showgrounds, racecourses and motor racing tracks.
- recreation facility (outdoor) - **recreation facility (outdoor)** means a building or place (other than a recreation area) used predominantly for outdoor recreation, whether or not operated for the purposes of gain, including a golf course, golf driving range, mini-golf centre, tennis court, paint-ball centre, lawn bowling green, outdoor swimming pool, equestrian centre, skate board ramp, go-kart track, rifle range, water-ski centre or any other building or place of a like character used for outdoor recreation (including any ancillary buildings), but does not include an entertainment facility or a recreation facility (major).
- creative industry - **creative industry** means a building or place the principal purpose of which is to produce or demonstrate arts, crafts, design or other creative products, and includes artists’ studios, recording studios, and set design and production facilities.  
 Note—  
 Creative industries are a type of light industry—see the definition of that term in this Dictionary.
- Educational establishment - **educational establishment** means a building or place used for education (including teaching), being -
  - A school, or
  - A tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.
- Childcare centres - **centre-based child care facility means -**
  - a building or place used for the education and care of children that provides any one or more of the following—
    - long day care,
    - occasional child care,
    - out-of-school-hours care (including vacation care),
    - preschool care, or

Consideration	Assessment	
	<ul style="list-style-type: none"> <li>– an approved family day care venue (within the meaning of the Children (Education and Care Services) National Law (NSW)),</li> <li>• Health services facility - <b>health services facility</b> means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following— <ul style="list-style-type: none"> <li>– a medical centre,</li> <li>– community health service facilities,</li> <li>– health consulting rooms,</li> <li>– patient transport facilities, including helipads and ambulance facilities,</li> <li>– hospital.</li> </ul> </li> </ul>	
<b>Permissibility</b>	<p>The proposal seeks consent for the Indicative allocation of floor space between the land uses described above. These land uses are all permissible within their respective land use zones as is described below. None of the proposed land use zones are prohibited at the site.</p>	
	<b>E1 Local Centre</b>	
	<p><i>Permitted with consent:</i>  <i>Amusement centres; Boarding houses; <b>Centre-based child care facilities; Commercial premises; Community facilities; Entertainment facilities; Function centres; Hotel or motel accommodation; Information and education facilities; Medical centres; light industries, Places of public worship; Public administration buildings; Recreation facilities (indoor); Respite day care centres; Shop top housing; Any other development not specified in item 2 or 4</b></i></p> <p><i>Prohibited:</i>  <i>Depots; Extractive industries; Freight transport facilities; Heavy industrial storage establishments; Industrial retail outlets; Industries; Pond-based aquaculture; Storage premises; Transport depots</i></p>	<p>Within the E1 Local Centre zone the following land uses are proposed which are permissible with consent:</p> <ul style="list-style-type: none"> <li>• Residential accommodation including residential flat buildings and shop top housing</li> <li>• Commercial premises</li> <li>• Community facilities</li> <li>• Creative Industries</li> <li>• Educational establishment</li> <li>• Centre-based childcare facilities</li> <li>• Recreation areas</li> <li>• Recreation facilities</li> <li>• Health services facility</li> </ul>
	<b>MU1 Mixed Use</b>	
	<p><i>Permitted with consent</i>  <i>Amusement centres; Boarding houses; Car parks; Centre-based child care facilities; <b>Commercial premises; Community facilities; Entertainment facilities; Function centres; Information and education facilities; light industries, Medical centres; Passenger transport facilities; Places of public worship; Recreation areas; Recreation facilities (indoor); Registered clubs; Respite day care centres; Shop top housing; Tourist and visitor accommodation; Any other development not specified in item 2 or 4</b></i></p> <p><i>Prohibited</i>  <i>Extractive industries; Heavy industrial storage establishments; Heavy industries; Pond-based aquaculture</i></p>	<p>Within the MU1 zone the following land uses are proposed which are permissible with consent:</p> <ul style="list-style-type: none"> <li>• Residential accommodation including residential flat buildings and shop top housing</li> <li>• Commercial premises</li> <li>• Community facilities</li> <li>• Educational establishment</li> <li>• Creative industries</li> <li>• Centre-based childcare facilities</li> <li>• Recreation areas</li> <li>• Recreation facilities</li> <li>• Health services facility</li> </ul>
<b>RE1 Public Recreation</b>		
<p><i>Permitted with consent</i>  <i>Centre-based child care facilities; Community facilities; Electricity generating works; Emergency services facilities; Environmental facilities; Food and drink premises; Information and education facilities; Jetties; Kiosks; Marinas; Markets; <b>Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Roads; Roadside stalls; Signage; Water recreation structures; Water recycling facilities; Water supply systems</b></i></p>	<p>Within the RE1 zone a new public park is proposed. A public park is a type of recreation area and is therefore permissible with consent.</p> <p>Recreation facilities are also permitted with consent in the RE1 zone.</p>	

Consideration	Assessment	
	<p><i>Prohibited</i> Any development not specified in item 2 or 3</p>	
	<b>SP2 Infrastructure – Classified Road</b>	
	<p><i>Permitted with consent</i> Aquaculture; Horticulture; Roads; Water storage facilities; Water treatment facilities; <b>The purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose</b></p> <p><i>Prohibited</i> Any development not specified in item 2 or 3</p>	<p>The site contains land mapped as SP2 Infrastructure – classified road. A limited range of land uses are permitted within the zone, including development that is ordinarily incidental or ancillary to the development for the purpose of a classified road.</p> <p>The proposed development will protect the SP2 zoned land for road widening to ensure that the land is retained free of incompatible development and remains available to accommodate future transport infrastructure improvements.</p>

### 7.3 Other Approvals

**Table 14** outlines other approvals that are required to carry out the proposed development under Division 4.7 of the EP&A Act.

**Table 14** Other approvals

Consideration	Assessment																
<b>Approvals not required for SSDA</b>	<table border="1"> <thead> <tr> <th>Act</th> <th>Authorisation Otherwise Required?</th> </tr> </thead> <tbody> <tr> <td>Fisheries Management Act 1994 - Section 201, 205 or 219</td> <td>No</td> </tr> <tr> <td>Heritage Act 1977 – Section 139</td> <td>Yes</td> </tr> <tr> <td>National Parks and Wildlife Act 1974 – Section 90</td> <td>No</td> </tr> <tr> <td>Rural Fires Act 1997 – Section 100B</td> <td>No</td> </tr> <tr> <td>Water Management Act 2000 - Section 89, 90 or 91</td> <td>Yes</td> </tr> </tbody> </table>	Act	Authorisation Otherwise Required?	Fisheries Management Act 1994 - Section 201, 205 or 219	No	Heritage Act 1977 – Section 139	Yes	National Parks and Wildlife Act 1974 – Section 90	No	Rural Fires Act 1997 – Section 100B	No	Water Management Act 2000 - Section 89, 90 or 91	Yes				
Act	Authorisation Otherwise Required?																
Fisheries Management Act 1994 - Section 201, 205 or 219	No																
Heritage Act 1977 – Section 139	Yes																
National Parks and Wildlife Act 1974 – Section 90	No																
Rural Fires Act 1997 – Section 100B	No																
Water Management Act 2000 - Section 89, 90 or 91	Yes																
<b>Consistent Approvals</b>	<table border="1"> <thead> <tr> <th>Act</th> <th>Authorisation Required?</th> </tr> </thead> <tbody> <tr> <td>Fisheries Management Act 1994 – Section 144</td> <td>No</td> </tr> <tr> <td>Coal Mine Subsidence Compensation Act 2017 – Section 22</td> <td>No</td> </tr> <tr> <td>Mining Act 1992 – Mining lease</td> <td>No</td> </tr> <tr> <td>Petroleum (Onshore) Act 1991 – Production lease</td> <td>No</td> </tr> <tr> <td>Protection of the Environment Operations Act 1997 – An environment protection licence under Chapter 3</td> <td>No</td> </tr> <tr> <td>Roads Act 1993 – Section 138</td> <td>Yes</td> </tr> <tr> <td>Pipelines Act 1967 – a licence</td> <td>No</td> </tr> </tbody> </table>	Act	Authorisation Required?	Fisheries Management Act 1994 – Section 144	No	Coal Mine Subsidence Compensation Act 2017 – Section 22	No	Mining Act 1992 – Mining lease	No	Petroleum (Onshore) Act 1991 – Production lease	No	Protection of the Environment Operations Act 1997 – An environment protection licence under Chapter 3	No	Roads Act 1993 – Section 138	Yes	Pipelines Act 1967 – a licence	No
Act	Authorisation Required?																
Fisheries Management Act 1994 – Section 144	No																
Coal Mine Subsidence Compensation Act 2017 – Section 22	No																
Mining Act 1992 – Mining lease	No																
Petroleum (Onshore) Act 1991 – Production lease	No																
Protection of the Environment Operations Act 1997 – An environment protection licence under Chapter 3	No																
Roads Act 1993 – Section 138	Yes																
Pipelines Act 1967 – a licence	No																
<b>EPBC Act Approval</b>																	
Environmental Protection and	The <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) is a federal legislation with an aim to protect and manage significant flora, fauna, ecological communities and heritage places that are identified as Matters of National Environmental Significance (MNES). If the proposed development results																

Consideration	Assessment
Biodiversity Conservation Act 1999	<p>in any impacts to any MNES, it must be referred to the Federal Department of the Climate Change, Energy, the Environment and Water (DCCEEW) to undertake an assessment to determine whether the development is a 'controlled action', which would then require an approval under the EPBC Act.</p> <p>A Biodiversity Development Assessment Report (BDAR) waiver request was prepared and submitted to DCCEEW on 22 December 2025. On 10 February 2026 a BDAR Waiver was granted by DCCEEW for the development and is included at <b>Appendix L</b>.</p> <p>The BDAR Waiver concludes that the proposed development is not expected to have any significant impacts on biodiversity values due to the highly modified and degraded nature of the subject site, and therefore a BDAR is not required for the proposal.</p>

### 7.3.1 Pre-Conditions to Exercising the Power to Grant Consent

**Table 15** identifies any pre-conditions for the consent authority in exercising their power to grant approval for the project.

**Table 15** Pre-conditions for the consent authority

Statutory Reference	Assessment
<b>EP&amp;A Act 1979 – Section 4.24 concept Development Consent</b>	The proposal seeks consent for a 'concept' approval in accordance with Section 4.24 of the EP&A Act.
<b>Biodiversity Conservation Act 2016</b>	<p>Section 7.9(2) of the <i>Biodiversity and Conservation Act 2016</i> (BC Act) requires that an SSDA be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environmental Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.</p> <p>As outlined above, a BDAR Waiver has been granted by DPHI for this SSDA, which is provided at <b>Appendix L</b>. The BDAR Waiver demonstrates that the concept development is not expected to have any significant impacts on biodiversity values as no physical works are proposed.</p>
<b>State Environmental Planning Policy (Transport and Infrastructure) 2021</b>	<p><b>Section 2.48 Determination of development applications – other development</b></p> <p>Section 2.48 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (T&amp;I SEPP) requires the consent authority to give written notice to the electricity supply authority for the area, and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network. As this concept proposal does not include or seek approval for any utility or electrical infrastructure works, it is not expected to trigger the referral requirement under Section 2.48 at this stage.</p> <p>While no referral is required for the concept application, the scale and indicative layout of the masterplan mean that servicing considerations have been examined at a high level. Detailed design of servicing infrastructure, including any works with potential interaction with electricity networks, will be addressed in subsequent detailed SSDAs, at which time the proposal will be consulted with the relevant utility authorities where required.</p> <p><b>Section 2.98 Development adjacent to rail corridors</b></p> <p>Section 2.98 of the T&amp;I SEPP 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.</p> <p>The subject site contains land that is located adjacent to Waterloo Metro Station and the Sydney Metro City &amp; Southwest Corridor. Therefore the application will be referred to TfNSW for comment as part of the SSDA exhibition process.</p> <p><b>Section 2.119 Development with frontage to classified road</b></p> <p>Section 2.119 of the T&amp;I SEPP 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.</p>

Statutory Reference	Assessment
	<p>The site has frontages to McEvoy Street which is a classified road. No vehicular access to basements is proposed from McEvoy Street.</p> <p><b>Section 2.120 Impact of road noise or vibration on non-road development</b>            Section 2.120 of the T&amp;I SEPP relates to the impact of noise or vibration generated by classified roads on nearby non-road development. The provision requires the consent authority to be satisfied that appropriate measures are incorporated into the development to minimise the potential impacts of road traffic noise or vibration on occupants and users of the development.</p> <p>As set out within the Acoustic and Vibration Impact Assessment, this application includes measures to ameliorate potential traffic noise within the site arising from McEvoy Street which is identified as a road carrying more than 20,000 vehicles. These measures are outlined in <b>Section 9.15</b> and the Acoustic Report attached as <b>Appendix BB</b>.</p> <p><b>Section 2.122 Traffic-generating Development</b>            The proposed SSDA is considered 'traffic development' in accordance with Clause 2.122 and Schedule 3 of the SEPP as it will facilitate the development of approximately 3,300 new dwellings. The application is required to be referred to TfNSW (Roads Division) for consideration. TfNSW will be notified as an agency as part of the SSDA exhibition process.</p>
<b>State Environmental Planning Policy (Resilience and Hazards) 2021</b>	<p>Chapter 4 of the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Specifically, Section 4.6(1)(b) requires the consent authority to be satisfied that the land is suitable in its contaminated state, or will be suitable after remediation, for the purpose for which the development is proposed to be carried out.</p> <p>An overarching remediation action plan has been prepared for Waterloo South, as detailed in <b>Section 9.7</b>. The plan provides a comprehensive remedial strategy to support the concept SSDA, and outlines the process for future stage-specific remediation works. The strategy provides a framework to ensure the site can be made suitable at detailed design stage.</p>

### 7.3.2 Mandatory Matters for Consideration

**Table 16** provides an assessment of the mandatory matters the consent authority is required to consider in deciding whether to grant approval for the project. A Statutory Compliance Table is provided at **Appendix B**.

**Table 16** Summary of mandatory matters for consideration

Plan	Comments
<b>Environmental Planning &amp; Assessment Act 1979</b>	<p>The development is consistent with the objects of the EP&amp;A Act for the following reasons:</p> <ul style="list-style-type: none"> <li>• The proposed development will deliver a comprehensive renewal of the Waterloo South precinct, improving living conditions, access to services, and the quality of the built environment. The redevelopment supports social and economic welfare through the provision of new housing, community facilities, public open space and supporting infrastructure within an established inner-city location.</li> <li>• The proposal makes a substantial contribution to housing supply, including a significant proportion of social and affordable housing. The redevelopment will replace ageing housing stock with contemporary, fit-for-purpose dwellings designed for long-term operation and maintenance.</li> <li>• The development promotes productivity through the efficient use of publicly owned land, existing transport connections and established urban services, supporting higher-density mixed-use development in a strategic metropolitan location.</li> <li>• A biodiversity assessment has been undertaken and determined that the site does not contain biodiversity values requiring further assessment. A Biodiversity Development Assessment Report waiver has been issued by the Department of Planning, Housing and Infrastructure. Environmental protection outcomes are further supported through the application of ESD measures addressing energy, water, waste and urban heat mitigation.</li> <li>• The proposal incorporates resilience measures at a precinct scale, including climate-responsive design, energy efficiency, water-sensitive urban design and sustainable materials, supporting adaptation and mitigation outcomes over the life of the development.</li> <li>• The development integrates measures to identify, protect and manage built and cultural heritage values, including Aboriginal cultural heritage. A Designing with Country approach has informed precinct planning and public domain outcomes through engagement with First Nations stakeholders.</li> </ul>

Plan	Comments
	<ul style="list-style-type: none"> <li>• The proposal is founded on design excellence principles and aims to deliver high-quality, safe buildings and public spaces. Design quality, construction standards and long-term building performance have been embedded into the concept to protect occupant health and safety.</li> <li>• Community and stakeholder engagement has been undertaken in preparation of the State Significant Development Application, as documented in <b>Section 7.0</b> of this EIS and the Engagement Report attached as <b>Appendix M</b>. Additional opportunities for public participation will be provided during exhibition, with issues raised considered as part of the assessment process.</li> <li>• The proposal applies ESD principles at a precinct scale, integrating economic, environmental and social considerations into planning and design decision-making to achieve sustainable long-term outcomes.</li> <li>• The level of assessment undertaken is proportionate to the concept approval stage and the environmental risks identified. Detailed matters will be appropriately addressed in subsequent development applications as the design is refined.</li> <li>• The redevelopment supports the orderly and economic use of land by consolidating development within an established urban precinct, optimising land use efficiency and aligning with strategic planning objectives for the area.</li> </ul> <p>The proposed development is consistent with Division 4.7 of the EP&amp;A Act, particularly for the following reasons:</p> <ul style="list-style-type: none"> <li>• the development has been declared to be State Significant Development; and</li> <li>• the development is not prohibited by an environmental planning instrument.</li> <li>• it has been evaluated and assessed against the relevant matters for consideration under Section 4.15(1), as outlined below <ul style="list-style-type: none"> <li>– (a)(i) any environmental planning instrument: <b>Section 0</b></li> <li>– (a)(iii) any development control plan: In accordance with section 2.10 of the State Environmental Planning Policy (Planning Systems) 2021, development control plans do not apply to State Significant Development. Notwithstanding this, the relevant provisions of the Sydney Development Control Plan 2012 have been considered where they are expressly referenced or incorporated by the Waterloo Estate (South) Design Guide 2022. The proposal has been designed to respond to these controls where relevant and appropriate at the concept approval stage.</li> <li>– (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality: <b>Section 9.0</b></li> <li>– (c) the suitability of the site for the development: <b>Section 10.8</b></li> <li>– (d) any submissions made in accordance with this Act or the regulations: <b>Section 8.0</b></li> <li>– (e) the public interest: <b>Section 10.7</b></li> </ul> </li> </ul>
<p><b>State Environmental Planning Policy (Housing) 2021</b></p>	<p>Clause 1.9 of the Sydney LEP 2012 specifies that certain parts of the Housing SEPP do not apply to the Waterloo South Precinct Area. This includes:</p> <ul style="list-style-type: none"> <li>• Chapter 2 Part 2 Division 1 In-fill affordable housing</li> <li>• Chapter 2 Part 2 Division 2 Boarding houses</li> <li>• Chapter 2 Part 2 Division 3 Boarding houses – relevant authorities</li> <li>• Chapter 2 Part 2 Division 5 Residential flat buildings – social housing providers, public authorities and joint ventures</li> <li>• Chapter 3 Part 3 Co-living housing</li> <li>• Chapter 3 Part 4 – Build-to-rent housing</li> </ul> <p>Exclusion from the SEPP does not prevent consent from being granted to these types of development at Waterloo South, as the land uses do not rely on the SEPP for permissibility and development standards.</p> <p><b>Chapter 4 Design of residential apartment development</b></p> <p>Chapter 4 of the Housing SEPP outlines the requirements for residential apartment development. Chapter 4 applies to:</p> <ul style="list-style-type: none"> <li>• the State, other than land to which State Environmental Planning Policy (Precincts—Regional) 2021, Chapter 4 applies.</li> <li>• development to which this chapter applies is referred to as residential apartment development.</li> <li>• development for the purposes of residential flat buildings,</li> <li>• development for the purposes of shop top housing,</li> <li>• mixed use development with a residential accommodation component that does not include boarding houses or co-living housing</li> </ul>

The proposed development seeks consent for the concept development that will include residential components to which Chapter 4 applies. The provisions of the Housing SEPP have been considered in the development of the concept envelopes and within the reference scheme, to ensure that future development can achieve the requirements of Chapter 4. The key provisions of the Housing SEPP have been considered in the preparation of the SSD application and are addressed below.

#### **Section 147 - Determination of development applications and modification applications for residential apartment development**

Under Section 147 development must not be granted to a residential apartment development unless the consent authority has considered the following:

- (1) *Development consent must not be granted to residential apartment development, and a development consent for residential apartment development must not be modified, unless the consent authority has considered the following—*
  - (a) *the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9,*
  - (b) *the Apartment Design Guide,*
  - (c) *any advice received from a design review panel within 14 days after the consent authority referred the development application or modification application to the panel.*
- (2) *The 14-day period referred to in subsection (1)(c) does not increase or otherwise affect the period in which a development application or modification application must be determined by the consent authority.*
- (3) *To avoid doubt, subsection (1)(b) does not require a consent authority to require compliance with design criteria specified in the Apartment Design Guide.*
- (4) *Subsection (1)(c) does not apply to State significant development.*

As required by Section 147, a Design Verification Statement has been prepared by SJB Architects and is included in **Appendix F** that addresses the Design Principles and provides an assessment of the proposal against the NSW Apartment Design Guide (ADG). The proposal's consistency with the ADG is discussed further in **Section 9.5** and **Appendix F**.

#### **Section 148 - Non-discretionary development standards for residential apartment development—the Act, s 4.15**

Section 148 of the Housing SEPP contains non-discretionary development standards for residential development. The object of this section is to identify development standards for particular matters relating to residential apartment development that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.

- (2) *The following are non-discretionary development standards—*
  - (a) *the car parking for the building must be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide*
  - (b) *the internal area for each apartment must be equal to, or greater than, the recommended minimum internal area for the apartment type specified in Part 4D of the Apartment Design Guide,*
  - (c) *the ceiling heights for the building must be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide*

As confirmed in the Design Verification Statement at **Appendix F**, the concept SSDA can meet the requirements of Section 148, as confirmed via the reference scheme prepared by SJB.

#### **Section 149 - Apartment Design Guide prevails over development control plans**

Section 149 of the Housing SEPP outlines that the Apartment Design Guide prevails over development control plans.

- (1) *A requirement, standard or control for residential apartment development that is specified in a development control plan and relates to the following matters has no effect if the Apartment Design Guide also specifies a requirement, standard or control in relation to the same matter—*
  - (a) *visual privacy,*
  - (b) *solar and daylight access,*
  - (c) *common circulation and spaces,*
  - (d) *apartment size and layout,*
  - (e) *ceiling heights,*
  - (f) *private open space and balconies,*
  - (g) *natural ventilation,*
  - (h) *storage*

Plan	Comments
	<p>Development Control Plans are not a matter for consideration in the assessment of SSDAs by virtue of Section 2.10 of the Planning Systems SEPP, which states that 'Development Control Plans... do not apply to... State significant development'. Notwithstanding this, the relevant provisions of the Sydney Development Control Plan 2012 have been considered where they are expressly referenced or incorporated by the Waterloo Estate (South) Design Guide 2022. The proposal has been designed to respond to these controls where relevant and appropriate at the concept approval stage.</p> <p>An assessment against the above matters contained within the ADG has been undertaken by SJB and included in the Design Verification Statement at <b>Appendix F</b>.</p>
<p><b>State Environmental Planning Policy (Industry and Employment) 2021</b></p>	<p><b>Chapter 3 Advertising and signage</b></p> <p>Chapter 3 of the <i>State Environmental Planning Policy (Industry and Employment) 2021</i> (Industry and Employment SEPP) provides the requirements for developments that include signage. A consent authority must not grant development consent to any application to display signage, unless the consent authority is satisfied –</p> <ul style="list-style-type: none"> <li>(a) <i>that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and</i></li> <li>(b) <i>that the signage satisfies the assessment criteria specified in Schedule 5.</i></li> </ul> <p>No signage is proposed as part of this concept development application. Signage will be resolved at detailed design stage.</p>
<p><b>State Environmental Planning Policy (Resilience and Hazards) 2021</b></p>	<p><b>Chapter 2 Coastal management</b></p> <p>Chapter 2 relates to coastal management. The site is not located within a coastal zone, and therefore, Chapter 2 does not apply.</p> <p><b>Chapter 3 Hazardous and offensive development</b></p> <p>The proposed development does not include hazardous or offensive development, as per Chapter 3.</p> <p><b>Chapter 4 Remediation of land</b></p> <p>Chapter 4, Section 4.6(2) details that a consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned. Pursuant to Section 4.6(3) and findings of the preliminary investigation, an overarching remediation action plan has been prepared for the site. The O-RAP establishes a precinct-wide remediation framework to manage areas of fill material impacted by contaminants. The O-RAP also requires that stage-specific Remedial Works Plans will be prepared and implemented as part of future applications to satisfy Section 4.6 of the Resilience and Hazards SEPP.</p> <p>The O-RAP concludes that subject to the implementation of mitigation measures proposed that the site can be made suitable for its intended uses and that contamination related risks can be managed in a manner that adequately protects human health and the environment.</p>
<p><b>State Environmental Planning Policy (Biodiversity and Conservation) 2021</b></p>	<p><b>Chapter 6 Water catchments</b></p> <p>Chapter 6 of the <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (Biodiversity and Conservation SEPP) provides provisions for land situated within water catchments. The site is located within the Sydney Harbour Catchment Area, and therefore Chapter 6 applies. Development consent must not be granted to development on land in a regulated catchment unless the consent authority is satisfied that the development ensures –</p> <ul style="list-style-type: none"> <li>(a) <i>the effect on the quality of water entering a natural waterbody will be as close as possible to neutral or beneficial, and</i></li> <li>(b) <i>the impact on water flow in a natural waterbody will be minimised.</i></li> </ul> <p>A precinct wide Stormwater management strategy has been prepared by WSce to the support the proposal and has included an assessment of the post-development stormwater quality. The findings of the assessment conclude that subject to the implementation of the proposed stormwater control measures, there will be no adverse impacts to the water quality of the Sydney Harbour Catchment. Refer to <b>Section 9.12</b> and <b>Appendix U</b> for further details.</p>
<p><b>State Environmental Planning Policy (Sustainable Buildings) 2022</b></p>	<p>The <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> (Sustainable Buildings SEPP) was adopted as part of the NSW Government's commitment to delivering sustainable and resilient buildings, to contribute to the target for net zero emissions by 2050.</p>

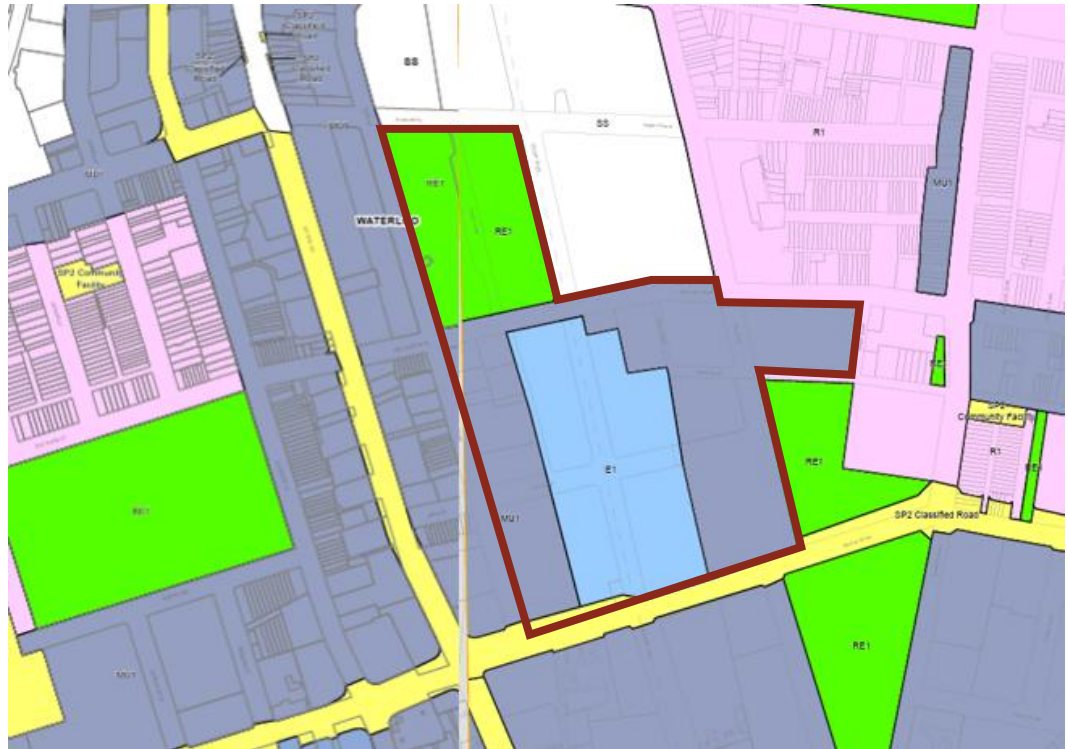
Plan	Comments
	<p>A precinct wide ESD Strategy has been prepared for the concept SSDA. The ESD Strategy establishes a precinct-wide sustainability framework that will inform future applications. The ESD Strategy identifies minimum sustainability performance targets to be achieved, including benchmarks for Green Star, BASIX, NatHERS and NABERS, as applicable to individual development stages and land uses.</p> <p>Refer to <b>Section 9.18</b> and <b>Appendix FF</b> for further details.</p>
<b>Sydney Local Environmental Plan 2012</b>	<p>An assessment of the proposed development against the provisions of the Sydney LEP 2012 is provided in <b>Table 17</b>.</p> <p><i>The Sydney LEP 2012 remains applicable to the proposed development, as per the savings provisions proposed under the Housekeeping Amendments, refer to Section 0</i></p>
<b>Sydney Development Control Plan 2012</b>	<p>It is noted that development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Section 2.10 of the Planning Systems SEPP, which states that 'Development Control Plans...do not apply to... State Significant Development.'</p> <p>Notwithstanding this, the relevant provisions of the Sydney Development Control Plan 2012 have been considered where they are expressly referenced or incorporated by the revised Design Guide. The proposal has been designed to respond to these controls where relevant and appropriate at the concept approval stage.</p> <p><i>The Sydney DCP remains applicable to the proposed development, as per the savings provisions proposed under the Housekeeping Amendments, refer to Section 0</i></p>
<b>Section 7.12 Contributions Plan 2024</b>	<p>In accordance with the VPA, the Developer the Minister and the City agree that public benefits will be provided in connection with the development rather than via contributions under Section 7.12 of the Act including the City of Sydney Development Contributions Plan 2015.</p>

### 7.3.3 Sydney Local Environmental Plan 2012

An assessment against the relevant clauses of the Sydney LEP 2012 is provided in **Table 17**.

**Table 17** Assessment against Sydney LEP 2012

Clause	Standard	Comment
<b>Clause 2.1 Land Use Zones</b>	<p>The site is zoned part E1 Local Centre, MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure.</p>	<p><u>E1 Local Centre</u> A broad range of land uses including residential, commercial, community, educational and recreational uses are permitted within the zone. Prohibitive uses are largely industrial land-use types.</p> <p><u>MU1 Mixed Use</u> A broad range of land uses including residential, commercial, community, educational and recreational uses are permitted within the zone. The small number of prohibited land use types include heavy industries, heavy industrial storage, extractive industries and pond-based aquaculture.</p> <p><u>RE1 Public Recreation</u> A limited range of land uses are permitted within the zone. Some of these include recreational and food and drink premises are permitted uses within the zone.</p> <p><u>SP2 Infrastructure</u> A limited range of land uses are permitted within the zone, including classified road in accordance with the zoning map.</p>



**Figure 68** Zoning of the site

Source: Sydney LEP 2012

**Clause 2.3 Zone objectives and land use table**

Objectives of the E1 Local Centre zone:

- To provide a range of retail, business and community uses that serve the needs of people who live in, work in or visit the area.
- To encourage investment in local commercial development that generates employment opportunities and economic growth.
- To enable residential development that contributes to a vibrant and active local centre and is consistent with the Council's strategic planning for residential development in the area.
- To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.
- To maximise public transport patronage and encourage walking and cycling.

Objectives of the MU1 Mixed Use zone:

- To encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities.
- To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.
- To ensure land uses support the viability of nearby centres.

The proposed development achieves the objectives of the E1 zone for the following reasons:

- The concept plan establishes an overarching framework for a mix of retail, commercial, community and residential uses that will serve the daily needs of residents, workers and visitors within Waterloo South and the surrounding area.
- The indicative allocation of non-residential floor space, including retail and community uses, supports investment in local commercial development and the creation of employment opportunities.
- Residential uses are integrated within the local centre in a manner that supports activity, safety and vitality, consistent with Council's strategic planning objectives for higher-density, transit-oriented locations.
- Ground-floor non-residential uses are prioritised along key streets and public spaces, including George Street, to deliver active frontages and support a vibrant public domain.
- The precinct's location adjacent to high-frequency public transport, including the Metro, together with walkable block sizes and connected pedestrian and cycling networks, maximises public transport patronage and encourages walking and cycling.

The proposed development achieves the objectives of the MU1 zone for the following reasons:

- The concept plan facilitates a diverse mix of commercial, community, and residential uses distributed across the precinct to support employment generation and economic activity.
- The built form and public domain framework is designed to deliver active and diverse street

Clause	Standard	Comment
	<ul style="list-style-type: none"> <li>To integrate suitable business, office, residential, retail and other land uses in accessible locations that maximise public transport patronage and encourage walking and cycling.</li> </ul> <p>Objectives of the RE1 Public Recreation zone:</p> <ul style="list-style-type: none"> <li>To enable land to be used for public open space or recreational purposes.</li> <li>To provide a range of recreational settings and activities and compatible land uses.</li> <li>To protect and enhance the natural environment for recreational purposes.</li> <li>To provide links between open space areas.</li> <li>To retain and promote access by members of the public to areas in the public domain including recreation facilities and waterways and other natural features.</li> <li>To protect sun access to publicly accessible land</li> </ul> <p>Objectives of the SP2 Infrastructure zone:</p> <ul style="list-style-type: none"> <li>To provide for infrastructure and related uses.</li> <li>To prevent development that is not compatible with or that may detract from the provision of infrastructure.</li> </ul>	<p>frontages, contributing to safe, vibrant and functional streets and public spaces.</p> <ul style="list-style-type: none"> <li>Land use interfaces are managed through building envelopes, setbacks, staging and detailed design controls to minimise potential conflicts between uses within the zone and adjoining zones.</li> <li>Ground-floor non-residential uses are encouraged in appropriate locations to support activation, employment and service provision.</li> <li>The scale and mix of uses are designed to complement and support the viability of nearby centres, including Green Square and surrounding local centres, rather than compete with them.</li> <li>The precinct is highly accessible by public transport and is designed to prioritise walking and cycling, ensuring land uses are integrated in a manner that supports sustainable travel behaviour.</li> </ul> <p>The proposed development achieves the objectives of the RE1 Public Recreation zone for the following reasons:</p> <ul style="list-style-type: none"> <li>The concept plan identifies and protects land for public open space and recreational purposes, including new and enhanced parks and open space areas within the precinct.</li> <li>A range of recreational settings and activities are enabled through the provision of landscaped parks, civic spaces and flexible open areas suitable for passive and active recreation.</li> <li>The landscape framework supports the protection and enhancement of the natural environment, including tree retention, new canopy planting, deep soil zones and water-sensitive urban design measures.</li> <li>Strong pedestrian and cycle links are proposed to connect open spaces within Waterloo South and to surrounding parks and green corridors, improving accessibility and legibility.</li> <li>Public access to open space is prioritised, with parks and public domain areas designed to be inclusive, safe and accessible for the broader community.</li> <li>Building envelopes and public domain design principles are intended to protect reasonable solar access to publicly accessible open spaces, to be confirmed through future detailed design.</li> </ul> <p>The proposed development achieves the objectives of the SP2 Infrastructure zone for the following reasons:</p> <ul style="list-style-type: none"> <li>The concept plan recognises and safeguards land zoned SP2 Infrastructure for the purpose of road widening, ensuring that the land is retained free of incompatible development and remains available to accommodate future transport infrastructure improvements.</li> <li>Development within the precinct has been planned to integrate with the SP2-zoned land by providing appropriate setbacks, access arrangements and design responses that do not prejudice the delivery, operation or functionality of the identified road widening works.</li> </ul>

Clause	Standard	Comment
		<ul style="list-style-type: none"> <li>The staging and delivery of the redevelopment has been structured to ensure that development adjoining SP2-zoned land does not constrain future infrastructure implementation, with detailed design to be addressed through subsequent SSDAs demonstrating ongoing compatibility with the road widening objective.</li> </ul>
<p><b>Clause 4.3 Height of buildings</b></p>	<p>The height of a building on any land must not exceed the maximum height of building shown on the Height of Buildings Map.</p>	<p>The Sydney LEP 2012 currently applies a range of maximum building heights across the Waterloo South precinct, varying between 9 metres and 110 metres. The concept plan establishes indicative maximum building envelopes with heights of up to RL 126.4m, which exceed the maximum heights permitted under the current LEP.</p> <p>In their current form, the LEP controls do not reflect the intended built form across Waterloo South and do not account for the additional GFA achievable through the design excellence bonus applicable to the site. As a result, the existing height provisions do not provide a clear or effective statutory framework to support the development outcomes envisaged for the precinct.</p> <p>Accordingly, amendments to the LEP height of buildings development standards are proposed through a concurrent Rezoning Proposal to align statutory controls with the concept SSDA. As outlined in <b>Section 7.3.5</b> the proposed maximum building heights comply with the proposed maximum building height controls outlined in the concurrent amendments to the Sydney LEP 2012 and Design Guide.</p> <p>The concept SSDA seeks approval for revised maximum building heights across the precinct consistent with the proposed built form framework. The following maximum building heights are sought:</p> <ul style="list-style-type: none"> <li>Block 2: 9.5m, 19m, 37m</li> <li>Block 3: 54m, 76m</li> <li>Block 4: 32m, 74m</li> <li>Block 5: 65m</li> <li>Block 6: 62m</li> <li>Block 7: 23m, 68m, RL126.40</li> <li>Block 8: 3m, 9.5m, 24m, 39m, 54m, RL126.40</li> <li>Block 9: 38m, 56m, RL 126.40</li> <li>Block 10: 39m, 62m, RL126.40</li> </ul> <p>The proposed maximum building heights comply with those that are illustrated in <b>Figure 69</b>.</p>
<p><b>Clause 4.4 Floor space ratio</b></p>	<p>The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.</p>	<p>The site is subject to a range of FSR development standards reflective of the variety of built forms envisioned for the site. The maximum FSR development standards across the Waterloo South precinct ranges from 0.85:1 and 8.41:1.</p> <p>As discussed above, the LEP controls are incompatible with the intended built form and do not adequately accommodate the additional GFA achievable through the design excellence bonus applicable to the site. Therefore, under the concurrent rezoning proposal, it is proposed to amend the Sydney LEP to align the</p>

Clause	Standard	Comment		
		<p>maximum FSR with the proposed building envelopes. As outlined in <b>Section 7.3.5</b> the proposed maximum FSRs comply with the proposed maximum FSR controls outlined in the concurrent amendments to the Sydney LEP 2012 and Design Guide.</p> <p>The concept SSDA seeks approval for maximum GFA across the site. A maximum GFA of 282,484.64m<sup>2</sup> is proposed under the concept SSDA, to be broken down as follows:</p> <ul style="list-style-type: none"> <li>• Block 2: 8,444.20m<sup>2</sup> (FSR of 1.05:1, 1.80:1, and 3.70:1)</li> <li>• Block 3: 33,505.88m<sup>2</sup> (FSR of 6.98:1 and 4.83:1)</li> <li>• Block 4: 26,185.59m<sup>2</sup> (FSR of 2.33:1 and 4.74:1)</li> <li>• Block 5: 17,593.73m<sup>2</sup> (FSR of 5.11:1)</li> <li>• Block 6: 18,491.20m<sup>2</sup> (FSR of 5.60:1)</li> <li>• Block 7: 38,350.77m<sup>2</sup> (FSR of 6.91:1 and 4.72:1)</li> <li>• Block 8: 51,923.56m<sup>2</sup> (FSR of 0.82:1, 2.54:1, 4:1 and 10.46:1)</li> <li>• Block 9: 45,404.69m<sup>2</sup> (FSR of 7.62:1 and 4.49:1)</li> <li>• Block 10: 42,585.06m<sup>2</sup> (FSR of 7.08:1 and 5.58:1)</li> </ul> <p>Each block has varied FSR controls which comply with the Sydney LEP 2012, as amended by the concurrent rezoning proposal. The existing and proposed maximum FSR maps are provided in <b>Figure 70</b>.</p>		
<p><b>Clause 5.1A</b> <b>Development on land to be acquired for public purpose</b></p>	<p>Clause 5.1A limits development on certain land that is intended to be acquired for public purposes.</p> <p>This clause applies to land shown on the Land Reservation Acquisition Map that is specified in Column 1 of the Table to this clause and that has not been acquired by the relevant authority of the State specified for the land in clause 5.1.</p> <p>Development consent must not be granted to any development on land to which this clause applies other than development for a purpose specified opposite that land in Column 2 of that Table.</p> <table border="1" data-bbox="384 1487 885 1657"> <tr> <td data-bbox="384 1487 635 1657"> <p><i>Column 1</i> Zone SP2 Infrastructure and marked "classified road"</p> </td> <td data-bbox="635 1487 885 1657"> <p><i>Column 2</i> Earthworks, Roads</p> </td> </tr> </table>	<p><i>Column 1</i> Zone SP2 Infrastructure and marked "classified road"</p>	<p><i>Column 2</i> Earthworks, Roads</p>	<p>The subject site includes land along the southern boundary of Block 8 that is zoned SP2 Infrastructure and identified on the Land Reservation Acquisition Map as "classified road." Under Column 2 of the Table to Clause 5.1A, development permissible on this land is limited to earthworks and roads.</p> <p>Accordingly, development consent cannot be granted for any other form of development within the reserved acquisition area. The proposal has been assessed with regard to this constraint and must ensure that no development is carried out within the affected portion of the site, other than development consistent with the permissible purposes specified under Clause 5.1A.</p> <p>The Block 8 building footprint has been setback from McEvoy Street to protect the land reserved for public purpose to be utilised to support road related infrastructure.</p>
<p><i>Column 1</i> Zone SP2 Infrastructure and marked "classified road"</p>	<p><i>Column 2</i> Earthworks, Roads</p>			
<p><b>Clause 5.3</b> <b>Development near zone boundaries</b></p>	<p>The objective of this clause is to provide flexibility where the investigation of a site and its surroundings reveals that a use allowed on the other side of a zone boundary would enable a more logical and appropriate development of the site and be compatible with the planning objectives and land uses for the adjoining zone.</p> <p>This clause applies to so much of any land that is within the relevant distance of a boundary between any 2 zones. The relevant distance is 6 metres from any land in Zone SP1 Special Activities or Zone SP2 Infrastructure.</p>	<p>Clause 5.3 applies to land located within 6 metres of a boundary adjoining Zone SP2 Infrastructure and land reserved for acquisition, and is intended to provide flexibility where strict adherence to zone boundaries would otherwise result in an illogical or inefficient development outcome.</p> <p>This provision allows development consent to be granted for a purpose permissible in the adjoining zone, despite the underlying zoning, provided the consent authority is satisfied that the development is not inconsistent with the objectives of development in both zones and that it represents a desirable planning outcome having regard to compatible land use planning,</p>		

Clause	Standard	Comment
	<p>Despite the provisions of this Plan relating to the purposes for which development may be carried out, development consent may be granted to development of land to which this clause applies for any purpose that may be carried out in the adjoining zone, but only if the consent authority is satisfied that—</p> <p>(a) the development is not inconsistent with the objectives for development in both zones, and</p> <p>(b) the carrying out of the development is desirable due to compatible land use planning, infrastructure capacity and other planning principles relating to the efficient and timely development of land.</p>	<p>infrastructure capacity and other relevant planning principles.</p> <p>In this instance, clause 5.3 provides flexibility in enabling development for a purpose that is compatible with both the SP2 Infrastructure zone and land reserved for acquisition and the adjoining zone, while facilitating a more logical and orderly development of the site.</p> <p>This is particularly relevant to the southern portion of Block 8 which is zoned SP2 and reserved for road widening. This clause enables development within 6m from the SP2 zone boundary to be utilised for uses permissible within the adjoining MU1 zone. The reference scheme includes the provision of a landscaped setback and substation within this area which is compatible with the MU1 zone.</p> <p>Clause 5.3 is proposed to be amended under the 'Housekeeping Amendments' as described in <b>Section 0</b> below.</p>
<p><b>Clause 5.10 Heritage conservation</b></p>	<p>Waterloo South contains a mix of local and State heritage items that reflect the area's historical development and contribute to its cultural significance, including:</p> <ul style="list-style-type: none"> <li>• I2077 - Former Waterloo Pre-school (225 Cope Street) including interior</li> <li>• I2078 - 2-storey Victorian terrace houses (circa 1880)</li> <li>• 12086 - Single-storey Interwar building, Electricity Substation No 174</li> <li>• 12085 - Duke of Wellington Hotel including interior</li> <li>• SHR 01630 - Potts Hill to Waterloo Pressure Tunnel and Shafts (located RL30 m underground)</li> </ul> <p>In addition to these on-site items, Waterloo South is immediately adjacent to the Waterloo Heritage Conservation Area and is located near several other conservation areas and individually listed heritage items. This context highlights the need for a sensitive approach to urban renewal that respects existing heritage values while supporting contemporary redevelopment.</p> <p>The concept SSDA has been informed by the location, significance and curtilage of identified heritage items and their settings. The proposed development establishes a framework that enables the retention and adaptive reuse of heritage items, maintains appropriate spatial relationships and view corridors, and ensures that future built form responds sympathetically to the scale, form and significance of surrounding heritage fabric. The proposed basements sit well above the pressure tunnel and shafts which are located RL 30m underground). Detailed design responses will be refined at subsequent development stages to ensure ongoing compliance with heritage conservation objectives.</p> <p>Accordingly, a Heritage Impact Statement and an Archaeological Technical Report have been prepared to support the concept SSDA and are included in this EIS at <b>Appendices X</b> and <b>Appendix W</b>. Heritage impacts and mitigation measures are discussed further in <b>Section 9.4</b> of this EIS.</p>	
<p><b>Clause 5.21 Flood planning</b></p>	<p>Clause 5.21 requires that development consent must not be granted to development on land that the consent authority considers to be within the flood planning area unless the consent authority is satisfied that the development:</p> <p>(a) <i>is compatible with the flood function and behaviour on the land, and</i></p> <p>(b) <i>will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and</i></p> <p>(c) <i>will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i></p> <p>(d) <i>incorporates appropriate measures to manage risk to life in the event of a flood, and</i></p> <p>(e) <i>will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.</i></p> <p>In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters—</p> <p>(a) <i>the impact of the development on projected changes to flood behaviour as a result of climate change,</i></p>	

Clause	Standard	Comment
	<p>(b) the intended design and scale of buildings resulting from the development,</p> <p>(c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,</p> <p>(d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.</p> <p>The site is affected by overland flow flooding. A precinct-wide Flood Management Strategy has been prepared to support the concept SSDA and guide the staged redevelopment of Waterloo South. The strategy is informed by a site-wide Flood Impact and Risk Assessment and is based on maintaining existing flood behaviour, retaining overland flow paths, and protecting development through the application of appropriate flood planning levels.</p> <p>The proposed development will not result in adverse flood impacts on surrounding properties, will manage risk to life through flood-aware design, and will not adversely affect downstream environments. Detailed assessment of flood impacts and mitigation measures is provided in <b>Section 9.13</b> of this EIS and the Flood Impact and Risk Assessment at <b>Appendix AA</b>.</p>	
<p><b>Clause 6.21C Design excellence</b></p>	<p>(1) Development consent must not be granted to development to which this Division applies unless, in the opinion of the consent authority, the proposed development exhibits design excellence.</p>	<p>The redevelopment of Waterloo South triggers the requirement for a competitive design process.</p>
<p><b>Clause 6.21D Competitive design process</b></p>	<p>(1) Development consent must not be granted to the following development to which this Division applies unless a competitive design process has been held in relation to the proposed development—</p> <p>(a) development in respect of a building that has, or will have, a height above ground level (existing) greater than—</p> <p>(i) 55 metres on land in Central Sydney, or</p> <p>(ii) 25 metres on any other land,</p> <p>(b) development having an estimated development cost of more than \$100,000,000,</p> <p>(c) development in respect of which a development control plan is required to be prepared under clause 7.20,</p> <p>(d) development for which the applicant has chosen such a process.</p>	<p>In November 2025, the Department announced a time-limited design competition exemption pathway to streamline planning processes and accelerate delivery of new housing for State Significant Development housing projects.</p> <p>While this pathway can apply to Waterloo South, it is only available for a limited period (until late November 2027). Given Waterloo South is a long-term, multi-stage redevelopment anticipated to be delivered over approximately 10-15 years, the project will extend beyond the exemption period. Accordingly, a tailored and adaptive approach to achieving design excellence will be adopted, as detailed in the Design Excellence Strategy attached in <b>Appendix N</b>.</p> <p>The scale of the redevelopment and the diversity of development types and tenures (including social, affordable and market housing, community uses, and public domain works) necessitate a flexible quality framework. The Design Excellence Strategy (refer to <b>Appendix N</b> establishes a benchmark and governance structure to consistently deliver high-quality outcomes across the life of the project, while enabling efficient and timely delivery of mixed-tenure housing.</p> <p>To request a design competition exemption for future market housing buildings, an Alternative Design Excellence Strategy will be prepared for submission with the detailed SSDAs, which outlines how the project meets the eight criteria required for the exemption. Homes NSW and Stockland will seek to utilise this exemption pathway for applicable future detailed stages of the redevelopment of Waterloo South.</p>

Clause	Standard	Comment
<b>Part 7 Local Provisions – general</b>		
<b>Division 1 Car parking ancillary to other development</b>		
<b>Clause 7.3 Car parking spaces not to exceed maximum set out in this Division</b>	The site is subject to maximum car parking provisions established by Division 7 of the LEP.	The draft Sydney LEP Housekeeping Amendments included a savings provision which will preserve the current car parking rates for Waterloo South. Therefore the parking rates at clause 7.3-7.9 remain applicable.  This clause establishes that development consent must not be granted to development that includes car parking spaces greater than the maximum established in this division.
<b>Clause 7.5 Residential flat buildings, dual occupancies and multi dwelling housing</b>	The site is located on land identified as Category A, as such there is a maximum car parking rate applicable for residential flat buildings, dual occupancies and multi dwelling housing. The maximum car parking rates for these purposes are as follows: <ul style="list-style-type: none"> <li>• For each studio dwelling – 0.1 car parking spaces</li> <li>• For each 1 bedroom dwelling – 0.3 car parking spaces</li> <li>• For each 2 bedroom dwelling – 0.7 car parking spaces</li> </ul> For each dwelling with 3 or more bedrooms – 1 car parking space	As identified in the Traffic Impact Assessment ( <b>Appendix CC</b> ), the reference scheme provides car parking below the maximum permissible car parking rates under the Sydney LEP 2012.  The detailed breakdown and allocation of car parking to individual blocks will be confirmed through subsequent detailed SSDAs, and will be designed to remain within the applicable maximum rates in the Sydney LEP 2012.  Parking provision at each detailed stage will be informed by block-specific traffic and transport assessment, operational requirements and the planning controls applying at the time of assessment.
<b>Clause 7.6 Office premises and business premises</b>	The site is located on land identified as Category D, as such there is a maximum car parking rate applicable for office and business premises. The maximum car parking rates for these purposes are as follows: <ul style="list-style-type: none"> <li>• if the building is on land in category D and has a floor space ratio of no more than 3.5:1—1 space for each 175 square metres of gross floor area of the building used for those purposes,</li> <li>• if the building is on land in category D, E or F and has a floor space ratio greater than that specified in paragraph (a), (b) or (c) respectively, the following formula is to be used—  <math display="block">M = (G \times A) \div (50 \times T)</math> where—  M is the maximum number of parking spaces, and  G is the gross floor area of all office premises and business premises in the building in square metres, and  A is the site area in square metres, and  T is the total gross floor area of all buildings on the site in square metres.</li> </ul>	
<b>Clause 7.7 Retail premises</b>	The site is located on land identified as Category D, as such there is a maximum car parking rate applicable for retail premises. The maximum car parking rates for these purposes are as follows: <ul style="list-style-type: none"> <li>• if the building is on land in category D and has a floor space ratio of no more than 3.5:1—1 space for each 90 square metres of gross floor area of the building used for those purposes,</li> </ul>	Under the concept SSDA, 60 retail car parking spaces are proposed for the Waterloo South precinct. These spaces represent the total retail parking provision required across the precinct (refer to <b>Appendix CC</b> ) and will be allocated entirely to Block 9 to support the future supermarket tenancy.  The retail parking spaces will be located within the basement levels of a mixed use building to support

Clause	Standard	Comment
	<ul style="list-style-type: none"> <li>if the building is on land in category D and has a floor space ratio greater than 3.5:1, the following formula is to be used—  <math display="block">M = (G \times A) \div (50 \times T)</math> where—  <b>M</b> is the maximum number of parking spaces, and  <b>G</b> is the gross floor area of all retail premises in the building in square metres, and  <b>A</b> is the site area in square metres, and</li> </ul>	<p>the operation and servicing needs of the proposed supermarket anchor tenancy. Concentrating the precinct's retail parking within a single block enables efficient parking management and supports the intended retail function without necessitating retail parking distribution across multiple blocks.</p>
<p><b>Clause 7.9 Other land uses</b></p>	<p>This clause of the LEP establishes maximum car parking rates for land-use types outside of those established by Clauses 7.4-7.8 as follows</p> <p><b>Centre-based child care facilities</b></p> <ul style="list-style-type: none"> <li>The maximum number of car parking spaces for a building used for the purposes of a centre-based child care facility is 1 space plus 1 space for every 100 square metres of the gross floor area of the building used for those purposes.</li> </ul> <p><b>Information and education facilities</b></p> <ul style="list-style-type: none"> <li>The maximum number of car parking spaces for a building used for the purposes of information and education facilities is 1 space for every 200 square metres of the gross floor area of the building used for those purposes.</li> </ul> <p><b>Health consulting rooms and medical centres</b></p> <ul style="list-style-type: none"> <li>The maximum number of car parking spaces for a building used for the purposes of health consulting rooms or medical centres on any land is 2 spaces for every consulting room.</li> </ul>	<p>As identified in the Traffic Impact Assessment (<b>Appendix CC</b>), the reference scheme provides car parking below the maximum permissible car parking rates under the Sydney LEP 2012.</p> <p>The detailed breakdown and allocation of car parking to individual blocks will be confirmed through subsequent detailed SSDAs, and will be designed to remain within the applicable maximum rates in the Sydney LEP 2012.</p> <p>Parking provision at each detailed stage will be informed by block-specific traffic and transport assessment, operational requirements and the planning controls applying at the time of assessment.</p>
<p><b>Division 4 Miscellaneous</b></p>		
<p><b>Clause 7.14 Acid Sulfate Soils</b></p>	<p>The objective of this clause is to ensure that development does not disturb, expose or drain acid sulfate soils and cause environmental damage.</p>	<p>The site is mapped as containing Class 5 acid sulphate soils. No physical works are proposed under this concept SSDA, therefore this clause does not apply and will be considered at future detailed stages.</p>
<p><b>Clause 7.16 Airspace Operations</b></p>	<p>(1) <i>The objectives of this clause are as follows—</i></p> <p>(a) <i>to provide for the effective and on-going operation of the Sydney (Kingsford-Smith) Airport by ensuring that such operation is not compromised by proposed development that penetrates the Limitation or Operations Surface for that airport,</i></p> <p>(b) <i>to protect the community from undue risk from such operation.</i></p> <p>(2) <i>If a development application is received and the consent authority is satisfied that the proposed development will penetrate the Limitation or Operations Surface, the consent authority must not grant development consent unless it has consulted with the relevant Commonwealth body about the application.</i></p> <p>(3) <i>The consent authority may grant development consent for the development, if the relevant Commonwealth body advises that—</i></p>	<p>The PANS-OPS CIRCLING Surface for Category B Aircraft is 126.4m above AHD. The concept SSDA seeks maximum building envelope heights to the PANS-OPS at 126.4m.</p> <p>Referral to the Civil Aviation Safety Authority will be required.</p> <p>An Aviation Impact Assessment at <b>Appendix GG</b> accompanies this report to demonstrate that the concept envelopes and future detailed SSDAs would be able to comply with the regulatory requirements. Refer to <b>Section 9.16</b> for further detail.</p>

Clause	Standard	Comment
	<p>(a) the development will penetrate the Limitation or Operations Surface but it has no objection to its construction, or</p> <p>(b) the development will not penetrate the Limitation or Operations Surface.</p> <p>(4) The consent authority must not grant development consent for the development, if the relevant Commonwealth body advises that the development will penetrate the Limitation or Operations Surface and should not be constructed.</p> <p>(5) In this clause—</p> <p><b>Limitation or Operations Surface</b> means the Obstacle Limitation Surface or the Procedures for Air Navigation Services Operations Surface as shown on the Obstacle Limitation Surface Map or the Procedures for Air Navigation Services Operations Surface Map for the Sydney (Kingsford-Smith) Airport.</p> <p><b>relevant Commonwealth body</b> means the body that is responsible for development decisions relating to the Sydney (Kingsford-Smith) Airport under Commonwealth legislation.</p>	
<p><b>Clause 7.20 Development requiring or authorising preparation of a development control plan</b></p>	<p>(2) Development consent must not be granted to development to which this clause applies on the following land unless a development control plan that provides for the matters in subclause (4) has been prepared for the land—</p> <p>(a) land in Central Sydney, if the site area for the development is more than 1,500 square metres or if the development will result in a building with a height greater than 55 metres above ground level (existing),</p> <p>(b) land (other than land in Central Sydney, land identified as “Enterprise Area” on the Locality and Site Identification Map or land in Zone E4 General Industrial), if the site area for the development is more than 5,000 square metres or if the development will result in a building with a height greater than 25 metres above ground level (existing),</p>	<p>Clause 7.10(2)(b) requires the preparation of a DCP for sites outside of central Sydney if the site area is more than 5,000m<sup>2</sup> or if the development will result in a building with a height greater than 25m above existing ground level. However as per section 2.10 of the Planning Systems SEPP, DCPs do not apply to State Significant Development.</p>
<p><b>Clause 7.27 Active street frontages</b></p>	<p>(2) This clause applies to land identified as “Active street frontage” on the Active Street Frontages Map.</p> <p>(3) Development consent must not be granted to the erection or change of use of a building on land to which this clause applies unless the consent authority is satisfied all premises facing the street on the ground floor will—</p> <p>(a) have active street frontages, and</p> <p>(b) be used for the purposes of—</p> <p>(i) for a building in Waterloo Estate (South)—Area 1— one or more of the following—</p> <p>(A) business premises,</p> <p>(B) centre-based child care facilities,</p> <p>(C) community facilities,</p> <p>(D) health services facilities,</p> <p>(E) retail premises, or</p> <p>(ii) otherwise—either or both of the following—</p> <p>(A) business premises,</p> <p>(B) retail premises.</p>	<p>Certain streets within the Waterloo South precinct are identified on the active street frontages map. The active street frontages map is proposed to be amended to reflect the location of active street frontages proposed under the concept SSDA scheme. This strategy ensures that the proposal complies with clause 7.27, as amended by the Rezoning Proposal.</p> <p>The current list of permissible active uses is narrower than the mix of uses anticipated under the concept SSDA, which identifies additional non-residential functions capable of generating pedestrian movement, supporting community life and contributing to the overall activation strategy for Waterloo South. In particular, educational establishments and creative industries, both of which attract regular visitation and support street-level engagement, are not presently included in clause 7.27(3)(b).</p> <p>Therefore clause 7.27 is proposed to amended via the concurrent rezoning, as outlined in <b>Section 7.3.5</b></p>

Clause	Standard	Comment
		to ensure consistency between the concept proposal and LEP control.
<b>Clause 7.29 Waterloo Estate (South) – Area 1</b>	<i>(2) This clause applies to Waterloo Estate (South)—Area 1.</i>	This clause applies to the site as it is mapped at Waterloo South Area 1.
<b>7.29 Waterloo Estate (South)—Area 1 (3)</b>	<i>3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied of the following— (a) at least 17,000m<sup>2</sup> of the gross floor area of all buildings on the land will be used for purposes other than residential accommodation,</i>	<p>The intent of this clause is to ensure that Waterloo South develops into a genuine mixed use precinct, with housing supported by retail and community services.</p> <p>Clause 7.29(3)(a) of the Sydney LEP 2012 currently requires that a minimum of 17,000m<sup>2</sup> of GFA within Waterloo Estate (South) be used for purposes other than residential accommodation</p> <p>The concept SSDA proposes 15,305m<sup>2</sup> of non-residential GFA across the Waterloo South precinct, including 9,916m<sup>2</sup> of non-residential GFA and 5,389m<sup>2</sup> of community uses GFA. This is 1,695m<sup>2</sup> short of the 17,000m<sup>2</sup> currently required under the Sydney LEP 2012. The balance of GFA will be redistributed to residential GFA, resulting in more dwellings provided across social, affordable and market tenures.</p> <p>This shortfall is to be rectified by amending clause 7.29(3) under the concurrent rezoning to reduce the minimum required provision of GFA to be used for purposes other than residential to 15,000m<sup>2</sup>. This is further explained in <b>Section 7.3.5</b> below.</p>
	<i>3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied of the following— (b) at least 5,000m<sup>2</sup> of the gross floor area of all buildings on the land will be used for the purposes of one or more of the following— (i) centre-based child care facilities, (ii) community facilities, (iii) health services facilities,</i>	<p>The proposal provides 5,000m<sup>2</sup> of community related uses including the potential for education/creative industries uses.</p> <p>Under the concurrent rezoning proposal it is therefore proposed to amend clause 7.29(3)(b), as is outlined in <b>Section 7.3.5</b>.</p>
	<i>(c) at least 26.5% of residential floor space will be used for the purposes of social housing premises,</i>	The concept proposal seeks consent for a minimum of 30% of the residential to be provided as social housing in accordance with clause 7.29(3)(c). This complies with the minimum requirement under the Sydney LEP 2012.
	<i>(d) at least 7% of residential floor space will be used for the purposes of affordable housing that is owned and managed by a registered community housing provider.</i>	The concept proposal seeks consent for approximately 20% of the residential GFA to be provided as affordable housing which meets the minimum requirement for 7% in accordance with clause 7.29(3)(d) therefore exceeding the requirements of the Sydney LEP 2012. The 7% will be provided as affordable housing in perpetuity and will be owned and managed by a CHP (City West Housing). Any affordable housing provided above 7% residential floor space will be provided for a minimum 25 years.
<b>7.29 Waterloo Estate (South)—Area 1 (4)</b>	<i>(4) In calculating gross floor area under subclause (3)(c) and (d), an amount of additional floor space permitted under clause 6.21D(3)(b) must be included.</i>	Under clause 7.29(4) a building demonstrating design excellence may exceed the maximum building height and FSR by 10% under clause 6.21D(3)(b).

Clause	Standard	Comment
		Clause 7.29(4) is proposed to be deleted under the concurrent rezoning as the design excellence floorspace has been incorporated within the maximum FSR development standards. This is discussed further in <b>Section 7.3.5</b> .
7.29 Waterloo Estate (South)—Area 1 (5)	<i>(5) Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the Design Guide—Waterloo Estate (South) published by the Department in November 2022.</i>	The concept SSDA has been designed with consideration of the revised 2022 Design Guide. However the Design Guide is proposed to be amended to ensure alignment with the planning framework under the Sydney LEP 2012 and to reflect the updated master planning outcomes for the precinct. Therefore under the concurrent Rezoning this clause will be amended to reference the updated Design Guide. This is further discussed in <b>Section 7.3.6</b> of the EIS.
7.29 Waterloo Estate (South)—Area 1 (6)	<i>(6) In determining the height of a building on land to which this clause applies, solar panels and associated structures must be excluded if the consent authority is satisfied the solar panels and associated structures will not— (a) have a significant adverse visual impact, or (b) adversely impact the amenity of neighbouring properties.</i>	The concept envelopes have been designed to the maximum height of buildings permitted on the site. However, detailed design may include structures such as those to facilitate rooftop access to communal open space and other amenities. Therefore the concurrent Rezoning Proposal amends this clause to allow rooftop access to communal open space and related amenity structures to extend beyond the height of building measurement. This is discussed further in <b>Section 0 and 7.3.5</b> .
7.29 Waterloo Estate (South)—Area 1 (7)	<i>(7) Clause 6.21D(3)(a) does not apply to a building on land to which this clause applies.</i>	The Rezoning Proposal amends this clause so that clause 6.21D(3)(b) of the Sydney LEP 2012 which permits additional FSR for the achievement of design excellence does not apply to development on the site.  It is noted that the currently permissible GFA under clause 6.21D(3)(b) will be accommodated within the revised FSR maps, and design excellence is still required to be demonstrated in the detailed development across the site.
7.29 Waterloo Estate (South)—Area 1 (8)	<i>(8) In this clause— residential floor space means the combined gross floor area of the parts of the buildings on land to which this clause applies that are used for the purposes of residential accommodation. social housing premises has the same meaning as in the Residential Tenancies Act 2010.</i>	These are noted.

### 7.3.4 Draft Sydney LEP 2012 Housekeeping Amendments

In December 2023, the City of Sydney resolved to endorse the draft 'Housekeeping Amendments' to the Sydney LEP 2012 and Sydney DCP 2012, with a Gateway Determination being issued in October 2024. Subsequently, the draft provisions were publicly exhibited until 15 March 2025 and on 19 June 2025 and reported to Council and the Central Sydney Planning Commission (CSPC) who endorsed the finalisation of the planning proposal and DCP amendments. At the time of writing this report, the planning proposal is in the finalisation stage, and it is expected to be gazetted in early 2026.

The proposed Sydney LEP 2012 amendments relate to the introduction of new controls, and amendment of existing development standards and provisions relating to the following key matters:

- Deep soil;
- Structures associated with green roofs;

- Parking in new developments;
- Design excellence processes and site-specific development control plans;
- Additional uses for accommodation floor space; and
- Heritage floor space scheme.

Key amendments to the Sydney LEP 2012 have been summarised in the following section.

Clause 6.21D of the Sydney LEP 2012 is proposed to be amended to:

- Raise the threshold for requiring a competitive design process (design competition) on land outside of Central Sydney from 25m to 35m.
- Remove the opportunity for a proponent to choose to undertake a competitive design process where it is not required by the LEP [remove clause 6.21D(d)].
- Permit Council to certify in writing that a competitive design process for a development is unreasonable or unnecessary in the circumstances. This will apply only to applications to be determined by Council, the Local Planning Panel, or CSPC. It is not intended to apply to State Significant Development or where the Minister is the consent authority.
- Permit the consent authority to award a bonus of up to 10% additional building height and up to 10% additional floor space to a building demonstrating design excellence when considering a DA resulting from a competitive process, or in the case of social and affordable housing by a CHP, resulting from the optional design review process.

Similarly, clause 7.20 of the Sydney LEP 2012 is proposed to be amended to:

- Clarify the instances where a site-specific development control plan is not required to be prepared. The change will permit the Council to certify in writing that such a plan would be unreasonable or unnecessary in the circumstances of the development. This change will only apply to applications to be determined by Council, the Local Planning Panel, or CSPC. It is not intended to apply to State Significant Development or where the Minister is the consent authority.
- Allow the Council to certify in writing if a development control plan should be required for some types of housing in non-residential zones where there may be impacts on employment uses.

During the public exhibition stage, between 17 December 2024 and 14 March 2025, a submission was made by Homes NSW to the City of Sydney Council in response to the proposed LEP and DCP amendments. The submission highlights how design choices had already been made, and contracts already been entered into on the basis of the existing LEP and DCP framework. The submission outlined areas of concern as follows:

- Proposed reduction to maximum car parking rates (LEP)
- Increased minimum floor-to floor heights (DCP)
- Revised dwelling mix requirements (DCP)
- Changes to loading dock and waste management collection point requirements (DCP)

The response from Council supported the provision of a savings provision within the Sydney LEP 2012 which will preserve the current car parking rates for Waterloo South, as well as an exemption from the draft DCP changes. The exemption from the draft DCP changes will be affected by site-specific guidance within Section 5 of the DCP that outlines where the Design Guide references Sydney DCP 2012, it is to the version that is current before these draft DCP amendments are made.

**Table 18** includes an assessment of the proposed changes to the Sydney LEP 2012 and its implications to the concept SSDA.

**Table 18** Implications of Draft Sydney LEP 2012 on the concept SSDA

Amendment	Summary of Changes	Comment
1 – Deep soil	<ul style="list-style-type: none"> <li>• Expands on matters to be addressed for design excellence and development that required the preparation of a site-specific development control plan (i.e. to include deep soil and tree planting)*</li> </ul>	The proposed deep soil provisions are applicable to the concept SSDA and future detailed SSDAs.

Amendment	Summary of Changes	Comment
		<p>The reference scheme prepared by SJB demonstrates that the site can suitably accommodate deep soil zones to meet the requirements of the proposed provision.</p> <p>An increase of 9% deep soil is achievable under the concept SSDA compared to the 2022 Design Guide.</p>
<b>2 – Structures associated with green roofs</b>	<ul style="list-style-type: none"> <li>Introduces a new clause to allow structures associated with green roofs to exceed building height limits when certain requirements are met</li> </ul>	<p>A site-specific provision also allows for some structures to exceed building height limits, and the rezoning will amend clause 7.29(6) to allow rooftop access to communal open space and related amenity structures to extend beyond the height of building measurement to apply to the site.</p> <p>The indicative reference scheme prepared by SJB demonstrates that buildings, inclusive of structures associated with green roofs can be accommodated within the maximum height limit.</p> <p>Future detailed SSDAs may still utilise this provision if building designs change to enable structures associated with green roofs to exceed the building height limits.</p>
<b>3 – Parking in new developments</b>	<ul style="list-style-type: none"> <li>Amends the Land Use and Transport Integration (LUTI) and Public Transport Accessibility Level Map (PTAL) maps to show changes in public transport accessibility across the LGA</li> <li>Amends the maximum parking rates for a range of multi-unit residential and non-residential uses</li> <li>Exempts Community Electric Vehicle (EV) charging spaces from maximum parking rates</li> <li>Introduces a new clause to make bicycle parking devices on ground floor or in basements exempt development</li> </ul>	<p>As outlined in this section, the housekeeping amendments have been amended to include a savings provision for the site in relation to car parking. As such, the car parking standards under the existing Sydney LEP 2012 will remain applicable to the concept SSDA.</p>
<b>4 – Protection of sun access to Gunyama Park and Cook and Phillip Park</b>	<ul style="list-style-type: none"> <li>Introduces a new sun access plane to protect sun access to Gunyama Park</li> <li>Adds Cook and Phillip Park, Sydney as a place where overshadowing from new development is restricted</li> </ul>	<p>Not applicable to the site.</p>
<b>5 – Exempt Development – Solar energy systems</b>	<ul style="list-style-type: none"> <li>Introduces new exempt development provisions for solar energy systems</li> </ul>	<p>Noted.</p>
<b>6 – Basement intensive plant agriculture</b>	<ul style="list-style-type: none"> <li>Adds a new provision to permit intensive plant agriculture in the basement of existing buildings that will not attract gross floor area</li> </ul>	<p>Not applicable to the site.</p>
<b>7 – Superseded sustainability targets for some residential development</b>	<ul style="list-style-type: none"> <li>Removes BASIX Energy stretch targets as a response to recent <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> changes</li> </ul>	<p>Noted.</p>
<b>8 – Design excellence processes and site-specific development control plans</b>	<ul style="list-style-type: none"> <li>Updates design excellence provisions to apply to significant alterations of existing buildings and removes the design alternatives process*</li> </ul>	<p>The redevelopment of Waterloo South triggers the requirement for a competitive design process. A Design Excellence Strategy has been prepared by Beam Planning and supports the SSDA. The DES outlines the overarching</p>

Amendment	Summary of Changes	Comment
	<ul style="list-style-type: none"> <li>Additional flexibility in the operation of a design competition for applications determined by Council, the Local Planning Panel or the Central Sydney Planning Committee by enabling a design excellence strategy to be approved where a concept DA (site-specific development control plan) is not required*</li> <li>Minor LEP amendments adding ESD benchmarks, target competitor and juror requirements and new alternative process for affordable housing and social housing projects to align with updates to the Competitive Design Policy*</li> <li>Update reference to new version of the Competitive Design Policy*</li> </ul>	<p>framework for the achievement of design excellence across the duration of the project.</p> <p>In November 2025, the Department announced that to streamline planning processes and accelerate the delivery of new housing, a design competition exemption pathway had been introduced for State Significant Development housing projects.</p> <p>To request a design competition exemption, an Alternative Design Excellence Strategy will be prepared which outlines how the project meets the eight criteria required for the exemption. Homes NSW and Stockland will seek to utilise this exemption pathway for applicable future detailed stages of the redevelopment of Waterloo South.</p>
9 – Change to Metropolitan Centre zone and Central Sydney boundary	<ul style="list-style-type: none"> <li>Makes a minor change to the mapped boundaries of Central Sydney and SP5 Metropolitan Centre zone to incorporate the Powerhouse Museum site</li> </ul>	Not applicable to the subject site.
10 – Additional uses for accommodation floor space	<ul style="list-style-type: none"> <li>Adds five non-residential uses that may be eligible for accommodation floor space</li> </ul>	Not applicable to the subject site.
11 – Superseded 'opportunity sites' in Central Sydney	<ul style="list-style-type: none"> <li>Removes superseded 'opportunity site' Floor Space provisions</li> </ul>	Not applicable to the subject site.
12 – Heritage Floor Space scheme	<ul style="list-style-type: none"> <li>Permits minor increases in gross floor area of buildings with registered (awarded) heritage floor space</li> </ul>	Not applicable to the subject site.
13 – Rezoning of the land in Alexandria	<ul style="list-style-type: none"> <li>Facilitates the delivery of essential road infrastructure to support the development of the Green Square Town Centre and improve east-west connectivity</li> </ul>	Not applicable to the subject site.
14 – Development near zone boundaries	<ul style="list-style-type: none"> <li>Clarifies the intent of provisions which provide development flexibility on land on either side of the SP1 Special Activities or SP2 Infrastructure zone boundaries</li> </ul>	<p>A portion of the site adjoining McEvoy Street is zoned SP2 Infrastructure and is reserved for future road widening. As such, the amended provisions of this clause will be applicable to the site.</p> <p>Clause 5.3 as proposed to be amended will enable the flexible use of 12m of the SP2 zoned land and land reserved for public purpose. adjoining McEvoy Street to be utilised for an ancillary purpose to the adjoining MU1 zoned land.</p>
15 – 257 Sussex Street	<ul style="list-style-type: none"> <li>Corrects an omission in Sydney LEP 2012 by allocating height of buildings and floor space ratio controls to 257 Sussex Street, Sydney</li> </ul>	Not applicable to the subject site.
16 – Affordable housing contributions	<ul style="list-style-type: none"> <li>Ensures affordable housing contributions in Central Sydney and on residual land applies to both a development application and any associated modification</li> </ul>	The concurrent rezoning seeks a formal exemption from this clause, which is consistent with the intention of PP-2021-3265 and the VPA applicable to site.

Amendment	Summary of Changes	Comment
		Therefore, the concept SSDA will not be subject to the requirement to provide affordable housing contributions under this clause. This approach is appropriate given that future redevelopment of the site will be required to deliver social and affordable housing well beyond the contribution otherwise generated under this scheme.
<b>17 – Cross City Tunnel ventilation stack</b>	<ul style="list-style-type: none"> <li>Removes the outdated Development near Cross City Tunnel ventilation stack provisions that apply in Sydney, Haymarket, Ultimo and Pyrmont</li> </ul>	Not applicable to the subject site.
<b>18 – Integration of planning controls</b>	<ul style="list-style-type: none"> <li>Integrates 'legacy' planning controls for major project development precincts into Sydney LEP 2012. Areas include former Carlton United Brewery site on Broadway (Central Park), Harold Park, Glebe Affordable Housing Project, certain Redfern Waterloo Authority Area sites, and 216-412 Gardeners Road, Rosebery.</li> </ul>	The site is not located within these sites and the existing LEP is applicable to the site.

### 7.3.5 Concurrent Rezoning Proposal

As is outlined in **Section 2.3**, amendments to the Sydney LEP 2012 are being progressed through a concurrent State-assessed Rezoning Proposal to ensure that the statutory planning framework appropriately supports the concept SSDA and the staged redevelopment of the Waterloo South precinct.

The Rezoning Proposal responds to outcomes from detailed design development, delivery planning and feasibility testing undertaken since the preparation of the earlier planning proposal and the publication of the Design Guide. This work has identified areas where the existing LEP controls do not fully align with the concept SSDA or provide a clear and effective statutory framework to support the intended built form, land-use mix and delivery strategy for the precinct.

In particular, the current height of buildings, floor space ratio and site-specific provisions do not consistently reflect the development capacity envisaged by the Design Guide, including floor space enabled through design excellence provisions. The concurrent rezoning is therefore required to align statutory controls with the proposed concept development and provide certainty for future detailed applications.

The concurrent Rezoning Proposal seeks to:

- align Sydney LEP 2012 height and floor space ratio controls with the refined concept building envelopes;
- integrate design excellence floor space into base development standards to improve clarity and certainty;
- update site-specific provisions to reflect the revised land-use mix and delivery strategy for Waterloo South; and
- ensure the Sydney LEP 2012, the 2022 Design Guide and the concept SSDA operate as a coherent and integrated planning framework.

Collectively, these changes will reduce reliance on site-specific variations at future stages, improve statutory clarity and support the orderly delivery of the precinct. The proposed amendments to the Sydney LEP 2012 include changes to:

- the Height of Buildings Map and Floor Space Ratio Map;
- active street frontage provisions; and
- site-specific controls applying to Waterloo Estate (South) – Area 1.

Detailed drafting instructions and clause wording are provided in the concurrent Rezoning Proposal and supporting LEP amendment documentation. The proposed amendments to the Sydney LEP 2012 and their implications to the concept SSDA are outlined in **Table 19**.

**Table 19** Proposed Amendments to Sydney LEP 2012

Control	Existing Clause	Proposed Changes
<b>Part 4 Principal Development Standards</b>		
<b>4.3 Height of buildings</b>	<p>(2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.</p> <p>Note.</p> <p>No maximum height is shown for land in Area 3 on the Height of Buildings Map. The maximum height for buildings on this land are determined by the sun access planes that are taken to extend over the land by clause 6.17.</p> <p>(2A) Despite any other provision of this Plan, the maximum height of a building on land shown as Area 1 or Area 2 on the Height of Buildings Map is the height of the building on the land as at the commencement of this Plan.</p>	<p>See <b>Figure 69</b> for proposed mapping.</p> <p>The concept SSDA complies with the maximum building heights proposed under concurrent rezoning.</p>
<b>4.4 Floor space ratio</b>	<p>The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.</p>	<p>See <b>Figure 70</b> for proposed mapping.</p> <p>The concept SSDA complies with the maximum FSR proposed under concurrent rezoning.</p>
<b>Part 7 Local provisions – general</b>		
<b>7.27 Active Street Frontages (3)(b)</b>	<p>(3) <i>Development consent must not be granted to the erection or change of use of a building on land to which this clause applies unless the consent authority is satisfied all premises facing the street on the ground floor will—</i></p> <p>(a) <i>have active street frontages, and</i></p> <p>(b) <i>be used for the purposes of—</i></p> <p>(i) <i>for a building in Waterloo Estate (South)—Area 1—one or more of the following—</i></p> <p>(A) <i>business premises,</i></p> <p>(B) <i>centre-based child care facilities,</i></p> <p>(C) <i>community facilities,</i></p> <p>(D) <i>health services facilities,</i></p> <p>(E) <i>retail premises, or</i></p>	<p>The concurrent Rezoning Proposal seeks to expand the list of active uses to include educational establishments and creative industries, providing greater flexibility to support pedestrian activity and street activation.</p> <p>The reference scheme locates a new school fronting George Street. Creative industries are proposed along Cooper Street to contribute to the establishment of Cooper Street as a creative and cultural precinct.</p> <p>These uses can be designed to have active street frontages and contribute to the ground plane amenity of the precinct consistent with the intention of the planning control.</p> <p>Accordingly, updates will also be made to the Active Street Frontages Map to correctly identify the location of active uses within the precinct (refer to <b>Figure 71</b>).</p>
<b>7.29 Waterloo Estate (South)—Area 1 (3)(a)</b>	<p>(3) <i>Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied of the following—</i></p> <p>(a) <i>at least 17,000m<sup>2</sup> of the gross floor area of all buildings on the land will be used for purposes other than residential accommodation,</i></p>	<p>The concurrent Rezoning Proposal proposes to amend clause 7.29(3)(a) to reduce the non-residential GFA requirement by 2,000m<sup>2</sup> to 15,000m<sup>2</sup> in response to the removal of the Health One Facility by Health NSW.</p> <p>The 2,000m<sup>2</sup> will be redistributed as residential GFA, ensuring that there is no overall loss in GFA and that a maximum number of dwellings are delivered.</p> <p>The concept SSDA proposes 15,305m<sup>2</sup> of non-residential GFA across the Waterloo South precinct. This complies with the minimum requirement for non-residential accommodation as per clause 7.29(3)(a) of the LEP.</p>
<b>7.29 Waterloo Estate (South) – Area 1 (3)(b) and 7.29(3)(b)(i)</b>	<p>(3) <i>Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied of the following—</i></p>	<p>The Rezoning Proposal seeks to amend this clause to enable educational establishments to contribute towards the minimum 5,000m<sup>2</sup> requirement.</p>

Control	Existing Clause	Proposed Changes
	<p>(b) at least 5,000m<sup>2</sup> of the gross floor area of all buildings on the land will be used for the purposes of one or more of the following—</p> <p>(i) centre-based child care facilities,</p> <p>(ii) community facilities,</p> <p>(iii) health services facilities,</p>	<p>The concept proposes 5,389m<sup>2</sup> of uses comprising centre-based child care facilities, community facilities, and other community uses, demonstrating compliance with this provision.</p>
7.29 Waterloo Estate (South) – Area 1 (5)	<p>(5) Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the Design Guide—Waterloo Estate (South) published by the Department in November 2022.</p>	<p>The Rezoning Proposal proposes to update the reference to the Design Guide to reflect the amended version prepared to support this concept SSDA.</p>
7.29 Waterloo Estate (South) – Area 1 (6)	<p>(6) In determining the height of a building on land to which this clause applies, solar panels and associated structures must be excluded if the consent authority is satisfied the solar panels and associated structures will not—</p> <p>(a) have a significant adverse visual impact, or</p> <p>(b) adversely impact the amenity of neighbouring properties.</p>	<p>The Rezoning seeks to extend the exclusion to exceeding the maximum building height to include rooftop access structures and communal open space elements, subject to amenity considerations. This change supports the provision of communal open space on the rooftops of buildings as is proposed under the concept SSDA.</p>
7.29 Waterloo Estate (South) – Area 1 (7)	<p>(7) Clause 6.21D(3)(a) does not apply to a building on land to which this clause applies.</p>	<p>The rezoning will amend this clause so that clause 6.21D(3)(b) of the Sydney LEP 2012 which permits additional FSR for the achievement of design excellence does not apply to development on the site. It is noted that the currently permissible GFA under clause 6.21D(3)(b) will be accommodated within the revised FSR maps, and design excellence is still required to be demonstrated across the site.</p> <p>The concept SSDA building envelopes have been formed to be inclusive of the design excellence bonus GFA achievable at the site.</p> <p><i>Note: design excellence requirements under Clause 6.21C will remain and the Design Guide will set out specific requirements aligning with broader City of Sydney approaches.</i></p>
7.29 Waterloo Estate (South) – Area 1 (8)	<p>(8) In this clause—</p> <p>residential floor space means the combined gross floor area of the parts of the buildings on land to which this clause applies that are used for the purposes of residential accommodation.</p> <p>social housing premises has the same meaning as in the Residential Tenancies Act 2010.</p>	<p>The rezoning includes a site-specific amendment to exclude Waterloo Estate (South) from the City of Sydney Affordable Housing Contributions Scheme. This reflects the fact that the concept delivers social and affordable housing in excess of the rates typically required under the Sydney LEP 2012 and avoids duplication of affordable housing contribution mechanisms. This approach is consistent with the intent of the former Planning Proposal upon the site.</p> <p>As such, the rezoning will also renumber existing clause 7.29(8) as clause 7.29(9).</p>
7.29 Waterloo Estate (South) – Area 1 (9)	<p>Nil</p>	<p>Insert definitions for <i>residential floor space</i> and <i>social housing premises</i>, consistent with existing LEP terminology and the Residential Tenancies Act 2010.</p>

### Height and Floor Space Ratio

The proposed maximum building height controls under the Sydney LEP 2012 as amended by the concurrent Rezoning Proposal are depicted in the revised maximum building height map in **Figure 69**. The proposed maximum building heights align with the maximum building heights achievable under the concept building envelopes.

An assessment of the indicative reference scheme against the proposed LEP maximum building height controls has been undertaken in **Table 20**, depicting one way in which the precinct could be designed in the future to comply with the maximum building heights.



**Figure 69** Proposed maximum building heights

Source: Design Report Appendix – As prepared by SJB

**Table 20** Proposed LEP maximum building height

Block	Existing maximum building height control	Existing indicative building heights in storeys control*	Proposed maximum building height control	Proposed indicative building heights in storeys*
Block 2	9m, 24m, 30m	2 storeys, 4 storeys, 8 storeys	9.5m, 19m, 37m	2 storeys, 4 storeys, 8 storeys
Block 3	34m	13 storeys	54m, 76m	15 storeys, 22 storeys
Block 4	34m	13 storeys	32m, 74m	8 storeys, 21 storeys
Block 5	38m	13 storeys	65m	18 storeys
Block 6	38m	13 storeys	62m	16 storeys
Block 7	34m, RL126.40	12 storeys, 27 storeys	23m, 68m, RL126.40	19 storeys, 28 storeys
Block 8	3m, 9m, 23m, 42m, RL126.40	2 storeys, 7 storeys, 8 storeys, 13 storeys, 33 storeys	3m, 9.5m, 24m, 39m, 54m, RL126.40	2 storeys, 6 storeys, 8 storeys, 10 storeys, 15 storeys, 33 storeys
Block 9	42m, RL126.40	13 storeys, 33 storeys	38m, 56m, RL 126.40	9 storeys, 16 storeys, 33 storeys
Block 10	38m, RL126.40	13 storeys, 30 storeys	39m, 62m, RL126.40	10 storeys, 17 storeys, 31 storeys

\*The indicative number of storeys in the above table reflects the maximum number of storeys within any given building as expressed within the 2022 Design Guide and the proposed Design Guide updates. In addition to these maximum storey heights, it is acknowledged that both schemes include additional podiums heights and lower parts of buildings (for e.g. 6 storeys) to provide a street wall at various locations.

The maximum FSR controls under the Sydney LEP 2012 as proposed to be amended are depicted in **Figure 70**. The maximum FSR for the precinct and each block aligns with the maximum GFA achievable at the site under the concept envelopes. An assessment of the indicative reference scheme against the proposed LEP maximum FSR controls has been undertaken in **Table 21** depicting one way in which the precinct could be designed in the future to comply with the maximum FSR control.



**Figure 70** Proposed maximum FSR map

Source: Sydney LEP and Urban Design Report prepared by SJB

**Table 21** Proposed maximum GFA per block

	Sub-Block	Existing block area	Existing mapped FSR control	Total GFA permitted in block	Proposed block area	Proposed FSR control	Proposed permitted GFA
<b>Block 2</b>	2B	765m <sup>2</sup>	1.45:1	1,109m <sup>2</sup>	899m <sup>2</sup>	1.80:1	1,618.20m <sup>2</sup>
	2C	366m <sup>2</sup>	1.5:1	549m <sup>2</sup>	366m <sup>2</sup>	1.05:1	384.30m <sup>2</sup>
	2D	1,603m <sup>2</sup>	3.59:1	5,755m <sup>2</sup>	1,741m <sup>2</sup>	3.70:1	6,441.70m <sup>2</sup>
<b>Block 3</b>	3A	2,946m <sup>2</sup>	5.91:1	17,411m <sup>2</sup>	2,788m <sup>2</sup>	6.98:1	19,460.24m <sup>2</sup>
	3B	2,940m <sup>2</sup>	5.31:1	15,611m <sup>2</sup>	2,908m <sup>2</sup>	4.83:1	14,045.64m <sup>2</sup>
<b>Block 4</b>	4B	1,320m <sup>2</sup>	3.12:1	4,118m <sup>2</sup>	1,317m <sup>2</sup>	2.33:1	3,068.61m <sup>2</sup>
	4C	4,759m <sup>2</sup>	4.16:1	19,797m <sup>2</sup>	4,877m <sup>2</sup>	4.74:1	23,116.98m <sup>2</sup>

	Sub-Block	Existing block area	Existing mapped FSR control	Total GFA permitted in block	Proposed block area	Proposed FSR control	Proposed permitted GFA
<b>Block 5</b>	5A	3,245m <sup>2</sup>	4.68:1	15,187m <sup>2</sup>	3,443m <sup>2</sup>	5.11:1	17,593.73m <sup>2</sup>
<b>Block 6</b>	6A	3,140m <sup>2</sup>	4.57:1	14,350m <sup>2</sup>	3,302m <sup>2</sup>	5.60:1	18,491.20m <sup>2</sup>
<b>Block 7</b>	7A	3,309m <sup>2</sup>	6.30:1	20,847m <sup>2</sup>	3,119m <sup>2</sup>	6.91:1	21,552.29m <sup>2</sup>
	7B	3,378m <sup>2</sup>	3.41:1	11,519m <sup>2</sup>	3,559m <sup>2</sup>	4.72:1	16,798.48m <sup>2</sup>
<b>Block 8</b>	8A(1)	3,733m <sup>2</sup>	8.41:1	31,395m <sup>2</sup>	3,773m <sup>2</sup>	10.46:1	39,465.58m <sup>2</sup>
	8A(2)	65m <sup>2</sup>	3.73:1	242m <sup>2</sup>	-	-	-
	8A(3)	38m <sup>2</sup>	4.74:1	180m <sup>2</sup>	-	-	-
	8B	1,924m <sup>2</sup>	3.73:1	7,177m <sup>2</sup>	2,296m <sup>2</sup>	2.54:1	5,831.84m <sup>2</sup>
	8C	1,795m <sup>2</sup>	4.74:1	8,508m <sup>2</sup>	1,446m <sup>2</sup>	4:1	5,784m <sup>2</sup>
	8D	1,117m <sup>2</sup>	0.95:1	1,061m <sup>2</sup>	1,027m <sup>2</sup>	0.82:1	842.14m <sup>2</sup>
<b>Block 9</b>	9A(1)	3,535m <sup>2</sup>	7.83:1	27,679m <sup>2</sup>	4,109m <sup>2</sup>	7.62:1	31,310.58m <sup>2</sup>
	9A(2)	514m <sup>2</sup>	4.13:1	2,123m <sup>2</sup>	-	-	-
	9B	3,296m <sup>2</sup>	4.13:1	13,612m <sup>2</sup>	3,139m <sup>2</sup>	4.49:1	14,094.11m <sup>2</sup>
<b>Block 10</b>	10A(1)	3,497m <sup>2</sup>	7.78:1	27,207m <sup>2</sup>	3,905m <sup>2</sup>	7.08:1	27,647.4m <sup>2</sup>
	10A(2)	652m <sup>2</sup>	3.61:1	2,354m <sup>2</sup>	-	-	-
	10B	2,497m <sup>2</sup>	3.61:1	9,014m <sup>2</sup>	2,677m <sup>2</sup>	5.58:1	14,937.66m <sup>2</sup>
<b>Sub Total</b>	-	50,434m <sup>2</sup>	-	256,805m <sup>2</sup> , or 282,485m <sup>2</sup> with 10% design excellence applied	50,691m <sup>2</sup>		282,484.64m <sup>2</sup>

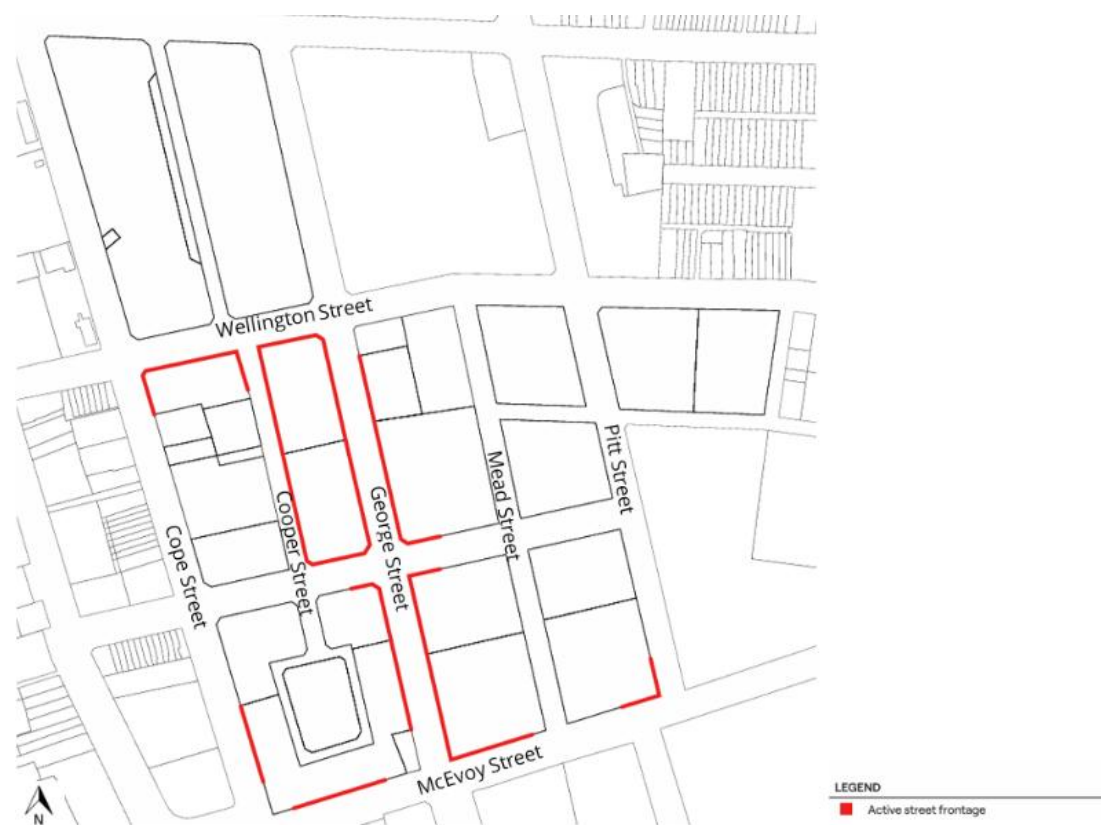
### Active Frontages

The proposed amendments to the LEP require the provision of active street frontages at the locations identified on the proposed Active Street Frontage Map (refer to **Figure 73**) and described in **Table 22**. The LEP map has been amended to align with the proposed distribution of active land uses under the concept SSDA (refer to **Figure 72**). The indicative reference scheme prepared by SJB depicts the possible uses that could be provided at the site to satisfy the active street frontages provision (refer to **Figure 73**).

**Table 22** Consistency between the LEP Active Frontage map and proposed active frontage locations

LEP Active Frontage Map	Proposed Active Frontages	Compliance
<b>Block 2</b>		
The northern aspect of Block 2 along Wellington Street, including the corners of Wellington and Cope Street and Wellington and Cooper Street.	N/A – this location relates to a privately owned site that is excluded from the development proposal.	N/A
<b>Block 3</b>		
All frontages of Block 3 including Wellington Street, George Street, John Street and Cooper Street.	Retail and non residential uses are proposed along the frontages of Block 3.	Yes.

LEP Active Frontage Map	Proposed Active Frontages	Compliance
<b>Block 4</b>		
The western frontage of Block 4 being George Street.	Retail, non residential and community uses are proposed along the western frontage of George Street.	Yes.
The southwestern corner of Block 4, being the corner of George Street and John Street.	Retail and non residential uses are proposed at the corner of George and John Street.	Yes.
<b>Block 8</b>		
The eastern frontage of Block 8 being George Street, including the corner of George and John Streets but excluding the corner of George and McEvoy Street.	Retail and non residential uses are proposed along the eastern frontage of Block 8.	Yes.
The southern frontage to McEvoy Street, excluding the corners of McEvoy and George Street and McEvoy and Cope Street.	Retail and non residential uses are proposed along the southern frontage of Block 8.	Yes.
The south western frontage of Block 8 excluding the corner of McEvoy and Cope Street.	Retail and non residential uses are proposed along the southern western frontage of Block 8.	Yes.
<b>Block 9</b>		
The western and southern aspect of Block 9, including the corner of George Street and John Street but excluding the corner of McEvoy Street and Mead Street.	Retail and non residential uses are proposed along the western and southern aspect of Block 9.	Yes.
<b>Block 10</b>		
The southwestern corner of Block 10 being the corner of McEvoy Street and Pitt Street.	Retail and non residential uses are proposed as the corner of McEvoy Street and Pitt Street.	Yes.

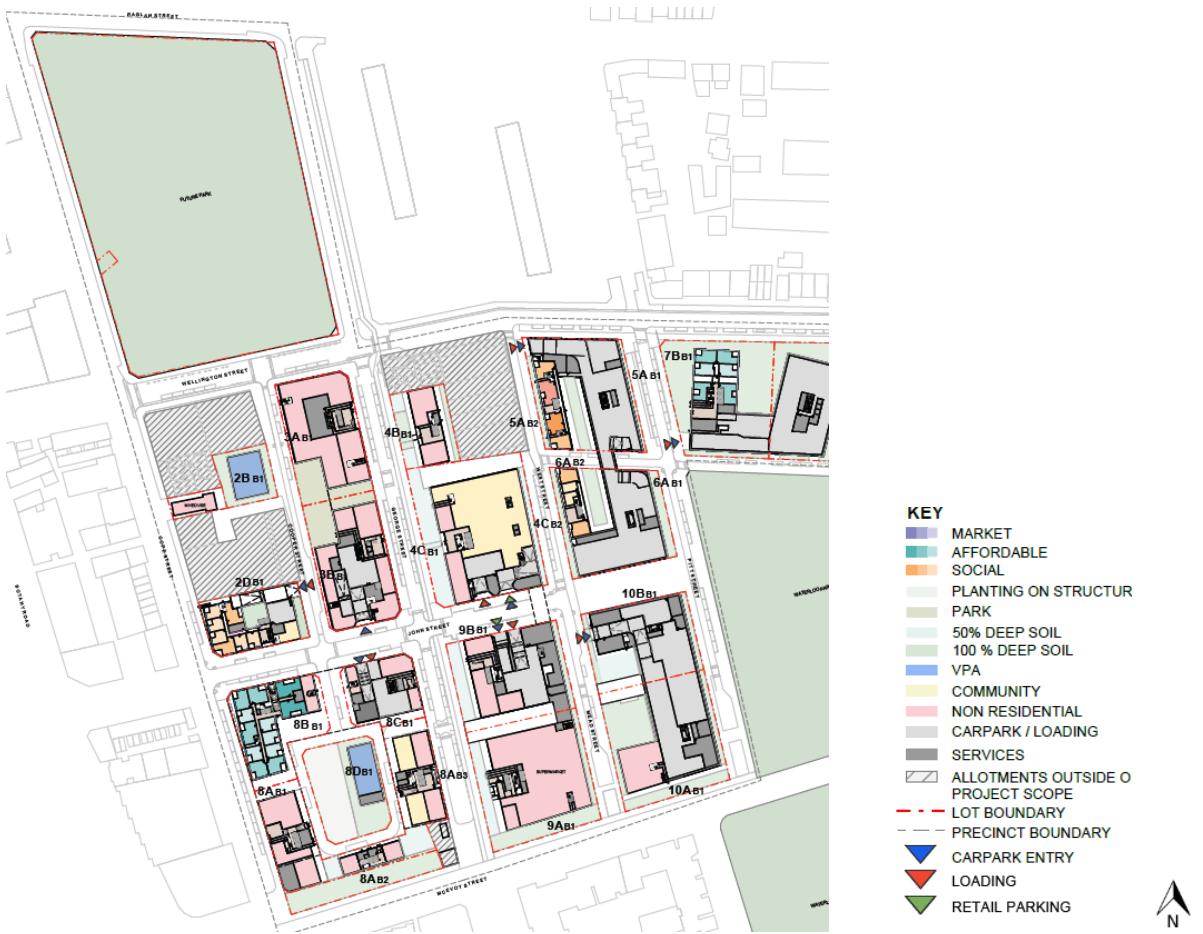


**Figure 71** Proposed LEP Active Street Frontage Map

Source: Design Report prepared by SJB



**Figure 72** Proposed concept SSDA active frontage locations  
 Source: Design Report prepared by SJB



**Figure 73** Indicative active uses proposed in reference scheme design  
 Source: Design Report prepared by SJB

### 7.3.6 Waterloo South Design Guide

The 2022 Design Guide was published by the Department on 11 November 2022 and commenced alongside amendments to the Sydney LEP 2012. The 2022 Design Guide provides detailed guidance to inform the future development of the precinct, including desired character, land use distribution, built form, public domain, transport, flooding, staging and implementation. In accordance with clause 7.29(5) of the Sydney LEP 2012, the 2022 Design Guide must be considered in the preparation and assessment of development applications for the site.

#### **7.29 Waterloo Estate (South)—Area 1**

*(5) Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the Design Guide—Waterloo Estate (South) published by the Department in November 2022.*

While the 2022 Design Guide does not establish statutory development standards, it is intended to guide development outcomes and may be applied with an appropriate degree of flexibility where alternative solutions demonstrably achieve the relevant objectives. Amendments to the Design Guide are being progressed concurrently with the State-Assessed Rezoning Proposal. An assessment of the concept SSSA against the provisions of the Design Guide has been undertaken in **Appendix E**.

## 8.0 Stakeholder Engagement

Preliminary stakeholder engagement has been undertaken for the project in accordance with the project SEARs and the principles of the *Department's Undertaking Engagement Guidelines for State Significant Development*, including being proportionate to its scale and likely level of community interest.

This chapter provides a summary of the engagement undertaken, initial feedback received and how the development responds to this. Ongoing engagement with the community and other stakeholders will also be carried out through the assessment of the concept SSDA. An Engagement Outcomes Report has been prepared by L10 Collective and is provided at **Appendix M**.

### 8.1 Pre-Lodgement Engagement Undertaken

#### 8.1.1 Identified Stakeholders for Engagement

The following key stakeholder groups were identified as potentially having an interest in the proposal:

- Local community comprising:
  - Existing social housing tenants and future residents of Waterloo South;
  - Residents living within and around the precinct;
- Community and human service providers;
- Aboriginal Stakeholders; and
- Government agencies and statutory authorities.

#### 8.1.2 Engagement Methodology

Various methods for consultation and engagement have been used to engage with the abovementioned stakeholders. These methods are summarised in **Table 23**.

**Table 23** Summary of engagement methodology

Activity	Stakeholder	Purpose
Drop-in space	Local community	<p>A dedicated drop-in space was provided next to Waterloo Connect which is Homes NSW' engagement office at Waterloo.</p> <p>This space provided a consistent and trusted location for tenants and neighbours to speak with a member of the engagement and project team to ask questions, view information and raise suggestions and concerns.</p> <p>The drop-in space was open Monday to Friday between 10am and 4pm throughout the pre-lodgement engagement period.</p>
Pop-ups	Local community	<p>Informal drop-in sessions were held in locations tenants regularly visit. These pop-up sessions provided opportunities to view material explaining the draft Proposal, ask questions and share feedback without needing to register or attend formal meetings.</p> <p>Pop-up dates and locations:</p> <ul style="list-style-type: none"> <li>• Thursday 30 October 2025, 11am–1pm – Waterloo Park, Pitt Street, Waterloo (Community BBQ)</li> <li>• Monday 3 November 2025, 12pm–2pm – Courtyard near Waterloo Neighbourhood Centre, 95 Wellington Street, Waterloo (Community BBQ)</li> <li>• Saturday 8 November 2025, 10am–12pm – Waterloo Metro Station entry at Cope &amp; Raglan Streets (Information stand)</li> <li>• Thursday 27 November 2025, 11am–1pm – 118 Wellington Street, Waterloo (corner George Street) (Community BBQ).</li> </ul> <p>Community members also had the opportunity to speak with project team members to find out more and share feedback at the Waterloo End of Year Community Celebration, which was held on Friday 21 November 2025, 2pm-5pm, Waterloo Green.</p>

Activity	Stakeholder	Purpose
Community information & feedback sessions	Local community	<p>Stockland and the CHP representatives hosted two structured in-person sessions, offering tenants and community members an opportunity to review and discuss the Proposal in further detail. These sessions enabled deeper conversations about the planning process, how the Proposal has evolved relative to the planning controls for Waterloo South that came into effect in 2022, and specific local concerns.</p> <p>Session details:</p> <ul style="list-style-type: none"> <li>Tuesday 18 November 2025, 5pm–7pm – Waterloo Neighbourhood Centre, 95 Wellington Street, Waterloo</li> <li>Saturday 22 November 2025, 1pm–3pm – Redfern Town Hall, 73 Pitt Street, Redfern</li> </ul>
Tenant-specific information and feedback sessions	Local community – existing tenants	<p>In addition to the broader community engagement activities, a series of tenant-specific sessions were held to support social housing tenants to understand the draft Proposal and provide direct feedback in a setting tailored to their needs.</p> <p>These sessions were designed to provide clear, accessible information, allow additional time for questions, and create a supportive environment for tenants to discuss the Proposal, the planning process, their perspective and potential impacts to them specifically. Formats were adjusted to suit different levels of familiarity with planning information, including small-group discussions and on-site conversations with the project and design team.</p> <p>Session details:</p> <ul style="list-style-type: none"> <li>Wednesday 29 October 2025 – Tenant orientation session, providing an overview of the draft Proposal and the planning process</li> <li>Thursday 6 November 2025 – Tenant focussed information and feedback session</li> <li>Tuesday 25 November 2025 – Walk-through with the design team to discuss the Proposal in relation to the local area</li> </ul>
Aboriginal engagement	Aboriginal Stakeholders	<p>To recognise Waterloo South's deep cultural significance as part of Gadigal Country, and its enduring role as a place of Aboriginal presence, community life and activism, dedicated engagement was undertaken to ensure First Nations voices were respected, heard and meaningfully integrated into planning and design outcomes. Engagement was approached as an ongoing, culturally safe relationship—building on extensive consultation already undertaken for Waterloo South, rather than a one-off exercise.</p> <p>Engagement activities included:</p> <ul style="list-style-type: none"> <li>Early and ongoing engagement with Gadigal Custodians, Elders and knowledge holders, Aboriginal community members and local organisations to ensure cultural authority and lived experience shaped decisions from the outset, before key directions were locked in.</li> <li>Yarning-based discussions, workshops and design conversations undertaken using culturally appropriate and relational methods that prioritised dialogue and iterative feedback over presentation-led consultation.</li> <li>Engagement with Aboriginal tenants and families, alongside local Aboriginal Community Controlled Organisations (ACCOs), service providers, artists and community leaders, to understand priorities relating to Country, cultural identity, housing outcomes, safety, wellbeing, open space, storytelling and community infrastructure.</li> <li>Opportunities to test and refine emerging ideas across multiple stages, ensuring community guidance informed design development and decision-making as proposals evolved.</li> </ul> <p>The specific Designing with Country sessions held during the pre-lodgement period included:</p> <ul style="list-style-type: none"> <li>29 September 2025 - Gadigal Traditional Owners</li> <li>17 November 2025 - Aboriginal Community Controlled Organisations</li> <li>24 November 2025 - Gadigal Traditional Owners (second session)</li> <li>8 December 2025 - Waterloo Aboriginal Housing Tenants</li> </ul>
Engaging multicultural communities	Local community	<p>Two language-specific sessions were held, one for Mandarin and Cantonese-speaking residents and one for Russian-speaking residents. These sessions included translated materials and interpreter support to ensure participants could engage confidently in their preferred language. The sessions held were:</p> <ul style="list-style-type: none"> <li>Mandarin and Cantonese session – at the regular Chinese Dance Group session at the Waterloo Neighbourhood Centre, 6 November 2025, 2pm-3pm</li> </ul>

Activity	Stakeholder	Purpose
		<ul style="list-style-type: none"> <li>Russian-speaking session – at the regular Russian Group gathering at the Factory Community Centre, 17 November 2025, 11.45am-12.45pm</li> <li>Cantonese speaking team members also supported engagement at the Community Information and Feedback Session held at Waterloo on 18 November 2025 and the Waterloo End of Year Community Celebration on 21 November 2025.</li> </ul>
Online engagement	Local community	<p>Two online sessions supported broader accessibility and enabled people with work, caring or mobility challenges to participate. One session provided a general overview of the Proposal, and the other was a targeted session with neighbouring property owners within Waterloo South to focus on localised matters such as overshadowing, street interfaces and staging.</p> <p>Session details:</p> <ul style="list-style-type: none"> <li>Monday 3 November 2025, 5pm – 6:30pm: Community information and feedback session</li> <li>Monday 24 November 2025, 5pm – 6:30pm: Online neighbours' session.</li> </ul>
Human services and local support networks	Community and human service providers	<p>Engagement with community organisations and social agencies that support the community, ensured that the needs of vulnerable residents, seniors, people with a disability and Culturally and Linguistically Diverse (CALD) communities, remained central to planning considerations.</p> <p>An information and feedback session specifically design for service providers was held on Tuesday 11 November between 10am-12pm at The Factory Community Centre in Waterloo.</p>
Agency consultation	Government agencies and statutory authorities	<p>Collaboration with government agencies and technical stakeholders has been an important part of developing the draft Proposal. A key focus of these sessions was to ensure the Proposal is consistent with local planning priorities, addresses increased infrastructure requirements, and responds to other regulatory needs.</p> <p>Engagement to date has included:</p> <ul style="list-style-type: none"> <li>City of Sydney: alignment with the Local Strategic Planning Statement, community facilities and open space allocation and design, and Connecting with Country direction;</li> <li>TfNSW: pedestrian movement and street safety, pubic transport integration, and future transport planning;</li> <li>DPHI: planning pathways, statutory assessment requirements and consultation compliance;</li> <li>Utilities and services providers: water, energy, telecommunications and stormwater infrastructure coordination;</li> <li>Health NSW: Planning for health services and understanding the current and future health priorities locally;</li> <li>Homes NSW: tenancy management, relocation principles and right of return.</li> </ul>

## 8.2 Preliminary Feedback and Responses

### 8.2.1 The Department and Government Architect NSW

During the pre-lodgement consultation period, several meetings were held with GANSW and the Department's Housing Assessments and State-led Rezoning teams. The feedback received is summarise in **Table 24** below.

**Table 24** The Department and GANSW Consultation Outcomes

Feedback	Response
DPHI confirmed that separate supporting reports for the concept SSDA and Rezoning Proposal applications are required.	Stockland and Homes NSW have structured the applications as two separate submissions to be lodged concurrently, as requested by DPHI officers.
DPHI provided contacts for the relevant government agencies to be consulted prior to lodgement of the application.	As part of the application, the proposed amendments to the Design Guide have been made in tracked changes and outlined the revised Design Excellence Strategy.
Relating to the Design Excellence Strategy, the GANSW outlined their preference to amend the design guide rather than submit a separate strategy document for the precinct.	

Feedback	Response
The GANSW outlined support for adopting a similar process for social and affordable buildings to that contained in the City of Sydney's Design Excellence Policy – i.e. direct appointment of architects and a design review panel process.	As recommended by the Department, Stockland has undertaken pre-lodgement engagement with the relevant government agencies.
The SSDA competition waiver for residential development was discussed, however as a result of policy/ guidelines released by GANSW at the time of these conversations this is now dealt with at detailed application phase.	As a result of the newly released guidelines by the GANSW for SSDA competitions relating to residential development, the competition waiver application will be included at the SEARs stage as the project progresses to the detailed application phase.

## 8.2.2 Agency feedback

Agency feedback collated during pre-lodgement consultation is outlined in **Table 25** below.

**Table 25** Agency consultation outcomes

Agency	Feedback	Response
TfNSW	<p>TfNSW (Sydney Metro and Sydney Trains) were engaged to discuss requirements for development near rail tunnels.</p> <p>Key matters raised included:</p> <ul style="list-style-type: none"> <li>Interface with the T8 Line (Airport &amp; South) and the Metro City &amp; Southwest tunnels, including track depth, alignment and rail safety protection works.</li> <li>Identification of first and second reserve zones and areas to be avoided in proximity to tunnels.</li> <li>Recognition that ground stress changes and bedding displacement have occurred as a result of tunnel construction.</li> </ul> <p>TfNSW advised that prior to construction the following would be required:</p> <ul style="list-style-type: none"> <li>Survey confirmation of tunnel positioning.</li> <li>Borehole depth controls and monitoring approaches to maintain permissible clearances to tunnels.</li> <li>Preparation and approval of a monitoring plan, engineering analysis and impact assessment.</li> </ul>	<ul style="list-style-type: none"> <li>The Applicant has engaged with Sydney Metro and Sydney Trains and will continue consultation through detailed planning and delivery stages.</li> <li>The Proposal acknowledges the presence of rail tunnels and associated protection requirements.</li> <li>Prior to construction, the Proponent will: <ul style="list-style-type: none"> <li>Confirm tunnel positioning through survey and investigation.</li> <li>Prepare detailed engineering analysis, impact assessment and a monitoring plan addressing tunnel protection requirements.</li> <li>Submit required documentation to TfNSW for review and agreement.</li> </ul> </li> <li>Site access for tunnel surveying and 3D scanning has already been undertaken to inform future works and detailed design.</li> </ul>
Crown Lands	Stockland requested consultation with Crown Lands via email. Crown Lands confirmed that there is no Crown Land included within the development footprint.	No further comment.
Schools Infrastructure NSW	Stockland requested consultation with Schools Infrastructure on Waterloo South. No response was received.	N/A
Homes NSW	Ongoing consultation has occurred between Stockland and Homes NSW as the Applicant of the concept SSDA throughout the preparation of this application.	Feedback received from Homes NSW has been integrated throughout the development of the proposed concept building envelopes and reference scheme.
Sydney Local Health District (SLHD)	<ul style="list-style-type: none"> <li>SLHD emphasised the importance of early consideration of the complex health, social and accessibility needs of the existing community, including residents with chronic health conditions, mental health needs, ageing-related mobility issues and limited family support.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing engagement with SLHD, tenants and service providers will continue to inform detailed design, relocation planning and operational arrangements to support health, wellbeing and continuity of community networks.</li> </ul>

Agency	Feedback	Response
	<ul style="list-style-type: none"> <li>• Strong support for place-based, co-located community services integrated with housing to improve outcomes for vulnerable residents.</li> <li>• Importance of culturally appropriate engagement approaches and recognising tenants as trusted community messengers.</li> <li>• Safety concerns, particularly at night, highlighting the role of CPTED principles, activation and ongoing management rather than enforcement alone.</li> <li>• Risks associated with relocation, including disruption to established social networks, loss of identity and wellbeing impacts, and the need for clear communication and relocation support.</li> <li>• Strong support for the early delivery of accessible, welcoming community spaces to reduce isolation and support mental health and social connection.</li> </ul>	
City of Sydney – Planning and Design Teams	<p>City of Sydney raised a range of urban design, access and interface matters, including:</p> <ul style="list-style-type: none"> <li>• The design and function of George Street, including traffic movement, access arrangements and active frontages.</li> <li>• Treatment of terraces as community floor space on Cope Street.</li> <li>• Basement access locations and the appropriateness of basement connections under Cope Street and John Street.</li> <li>• Traffic noise impacts from McEvoy Street.</li> <li>• Deep soil planting requirements and protection of the public domain.</li> <li>• Potential conflicts associated with loading areas, childcare locations and residential interfaces.</li> <li>• Consideration of setbacks and design responses around infrastructure, including the Block 8 substation.</li> <li>• The reference to the current AS for car parking dimensions was noted and agreed.</li> <li>• The ARR 2019 flood models were agreed to be utilised within the flood impact assessment.</li> </ul>	<p>The submitted precinct design has been amended to respond to City of Sydney feedback, including:</p> <ul style="list-style-type: none"> <li>• Refinement of George Street to align with the Design Guide, confirmation of access arrangements and provision of continuous active frontages</li> <li>• Removal of Cope Street terraces from community floor space dedication.</li> <li>• Inclusion of deep soil planting in accordance with City of Sydney requirements.</li> <li>• Basement access, loading, childcare locations and interface treatments will be further refined through detailed development applications to minimise conflicts and protect residential amenity.</li> <li>• Traffic noise and public domain impacts will be addressed through detailed design and supporting technical studies.</li> <li>• The Proposal establishes key planning parameters, with detailed resolution of setbacks, access, infrastructure interfaces and streetscape outcomes to occur at subsequent stages in consultation with City of Sydney.</li> </ul>
City of Sydney – Public Infrastructure Working Group	<ul style="list-style-type: none"> <li>• Pedestrians should be prioritised over bicycles and vehicles in the design of streets within Waterloo South.</li> <li>• Interest in opening the southern end of George Street to traffic, subject to TfNSW approval, including potential left-in/left-out movements.</li> <li>• Further investigation requested regarding the application of Sydney Water guidelines and opportunities for street tree planting across the precinct.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal prioritises pedestrians through the street hierarchy, including safe separation between pedestrians, cyclists and vehicles.</li> <li>• Street widths, setbacks and footpath dimensions have been designed to improve pedestrian comfort and safety at ground level.</li> <li>• Discussions with TfNSW regarding traffic access at the southern end of George Street are ongoing; the Proposal has been designed to comply with the Design Guide while allowing for future road opening if approved.</li> <li>• Street tree planting and public domain outcomes will be refined through detailed design in accordance with City of Sydney and Sydney Water requirements.</li> </ul>
Social Planning and Safer Cities Unit	<ul style="list-style-type: none"> <li>• Importance of building on existing consultation, research and strategic work rather than restarting engagement processes.</li> </ul>	<ul style="list-style-type: none"> <li>• Feedback from City of Sydney informed the preparation of the concept SSDA and Rezoning Proposal, building on earlier research, consultation and engagement outcomes.</li> </ul>

Agency	Feedback	Response
	<ul style="list-style-type: none"> <li>• Need to plan for demographic change, including how redevelopment scale and dwelling mix will reshape community needs over time.</li> <li>• Concerns about the social impacts of rapid change, particularly community cohesion, wellbeing and trust during transition.</li> <li>• Importance of strong governance, resourcing and alignment between planning frameworks, service delivery and place planning.</li> <li>• Emphasis on safety, belonging and CPTED principles during construction and operation.</li> <li>• Community facilities and services should be equitably distributed and accessible across the precinct, rather than concentrated.</li> <li>• Lessons from other renewal projects highlight the risk of social conflict if communities feel excluded from change.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal establishes a strategic framework that supports social cohesion, wellbeing and inclusion as the precinct transitions over time.</li> <li>• Community facilities and services are planned to be distributed across the precinct to support equitable access and social inclusion.</li> <li>• A Place Activation Strategy will be developed in consultation with Homes NSW and key stakeholders to support social connection, safety and belonging.</li> <li>• Governance and precinct management arrangements will be developed with Homes NSW and Community Housing Providers to address tenant support, safety and access to services.</li> <li>• Safety and CPTED principles will be embedded through detailed design and technical studies at future development application stages.</li> <li>• Ongoing engagement will continue as designs are refined to ensure community needs are addressed throughout redevelopment.</li> </ul>
Sydney Water	<ul style="list-style-type: none"> <li>• Sydney Water issued a feasibility letter outlining initial guidance on wastewater and potable water capacity within Waterloo South.</li> <li>• Existing infrastructure capacity is insufficient to support the renewal.</li> <li>• Key requirements include upgrades to wastewater and potable water infrastructure and provision of on-site stormwater detention within each block.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal has been informed by Sydney Water's feasibility advice.</li> <li>• Water, wastewater and stormwater servicing requirements will be addressed through future detailed design and development applications.</li> <li>• On-site stormwater detention will be incorporated within each block in accordance with Sydney Water requirements.</li> </ul>
Ausgrid	<ul style="list-style-type: none"> <li>• Ausgrid advised that existing electrical infrastructure is insufficient to support the redevelopment.</li> <li>• New high-voltage feeders will be required, supplied from the Zetland Zone Substation.</li> <li>• Compliance with Ausgrid requirements is required for the precinct-wide masterplan, public domain works and individual blocks.</li> </ul>	<ul style="list-style-type: none"> <li>• Stockland and ASP3 are continuing to liaise with Ausgrid to progress servicing requirements.</li> <li>• Electrical infrastructure upgrades will be coordinated through detailed design.</li> <li>• Separate future applications will address precinct-wide infrastructure, public domain works and individual development blocks in accordance with Ausgrid requirements.</li> </ul>
Communication Carriers (including NBN Co, Nextgen, Optus, PIPE Networks, Telstra, Verizon, Vocus and others)	<ul style="list-style-type: none"> <li>• Early engagement has occurred with communication carriers servicing and intersecting Waterloo South.</li> <li>• Existing overhead telecommunications infrastructure within the precinct is redundant and no longer in use.</li> <li>• New telecommunications services will be provided by NBN, with initial advice received.</li> <li>• Key considerations include decommissioning existing infrastructure and establishing new connections to support future services.</li> </ul>	<ul style="list-style-type: none"> <li>• A detailed approach to telecommunications servicing will be developed following receipt of detailed asset information from carriers.</li> <li>• Decommissioning, removal and delivery of new telecommunications infrastructure will be coordinated with service providers.</li> <li>• Telecommunications servicing will be addressed through future detailed development applications.</li> </ul>
Jemena Gas	<ul style="list-style-type: none"> <li>• The Waterloo South project will be fully electrified and no new gas infrastructure is required.</li> <li>• Existing gas infrastructure traversing the precinct will remain operational for future use where required.</li> </ul>	<ul style="list-style-type: none"> <li>• Existing gas infrastructure will be reviewed in consultation with Jemena.</li> <li>• Disconnection, decommissioning or removal will be coordinated with the relevant authority where required.</li> <li>• Gas infrastructure matters will be addressed through detailed design and future development applications.</li> </ul>

### 8.2.3 Community Feedback

Extensive community consultation has occurred during the pre-lodgement consultation period. This feedback has been collated within the Engagement Outcomes Report, along with the proposed response to the feedback. **Table 26** provides a summary of the key issues raised by the community throughout the engagement process and how this has been responded to within the proposal. Please refer to the Engagement Outcomes Report at **Appendix M** for further detail.

**Table 26** Summary of community engagement feedback

Theme	Feedback	Response
<b>Overall neighbourhood and building layout</b>	<ul style="list-style-type: none"> <li>Strong support for the revised precinct layout compared with the 2022 Rezoning and Design Guide, which was widely described as more open, lighter and more liveable.</li> <li>Desire for increased building separation to reduce perceived bulk, improve privacy, daylight, ventilation and comfort, and avoid canyon effects.</li> <li>Importance of a clear neighbourhood structure with a central, pedestrian-oriented spine (particularly Cooper Street) to support wayfinding, safety and community interaction.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal establishes a clear strategic neighbourhood structure and maximum building envelopes that guide future detailed design.</li> <li>Building separation, layout and envelopes have been refined to reduce perceived bulk, improve privacy, daylight and ventilation, and avoid canyon effects.</li> <li>Cooper Street is reinforced as a central, pedestrian-oriented spine to support wayfinding, safety, social interaction and community life.</li> <li>Detailed architectural design and interface treatments will be resolved through future development applications supported by technical studies.</li> </ul>
<b>Walkability, permeability and safety</b>	<ul style="list-style-type: none"> <li>Strong support for improved pedestrian connectivity, clearer desire lines and reduced vehicle dominance.</li> <li>Safety concerns focused on lighting, sightlines, activation, weather protection and careful interface treatment near private properties.</li> <li>Emphasis on accessibility for older people, children and people with disability.</li> </ul>	<ul style="list-style-type: none"> <li>The Proposal improves pedestrian connectivity through new links, clearer desire lines and a legible movement network, with reduced vehicle dominance in internal streets.</li> <li>Streets and public spaces are structured to support safety through improved sightlines, activation and passive surveillance.</li> <li>Accessibility for older people, children and people with disability has informed the movement framework.</li> </ul> <p>Detailed lighting, weather protection and interface treatments near private properties will be addressed through subsequent detailed design stages.</p>
<b>Housing mix and allocation</b>	<ul style="list-style-type: none"> <li>Broad support for the proportion and integration of social and affordable housing.</li> <li>Strong preference for tenure-blind outcomes to avoid stigma.</li> <li>Requests for a diverse dwelling mix to meet changing household needs, including family-sized dwellings and accommodation for multigenerational households.</li> <li>Interest in clarity around affordable housing delivery, duration and allocation processes.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal delivers a mix of social, affordable and market housing in accordance with statutory requirements.</li> <li>A tenure-blind approach is embedded to promote inclusion and avoid stigma across the precinct.</li> <li>The strategic framework allows flexibility to deliver a diverse dwelling mix responsive to changing household needs over time.</li> </ul> <p>Affordable housing delivery, duration, allocation and management arrangements will be confirmed through future stages in collaboration with Homes NSW and CHPs.</p>
<b>Open Space</b>	<ul style="list-style-type: none"> <li>Positive response to the increase in ground-level open space and the variety of parks, pocket parks and smaller, quieter spaces.</li> <li>Importance of accessibility, safety, shade, seating, tree canopy and everyday usability.</li> <li>Interest in culturally appropriate spaces, youth spaces, dog-friendly areas and careful management of interfaces with nearby homes.</li> <li>Questions regarding the timing and staging of open space delivery.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal establishes a strategic open space framework, including major parks, pocket parks and ground-level outdoor spaces distributed across the precinct.</li> <li>Building envelopes and footprints have been shaped to increase ground-level open space and improve accessibility, solar access and everyday usability.</li> <li>Detailed design will address safety, shade, seating, tree canopy, interfaces with nearby homes and culturally appropriate outcomes.</li> </ul>

Theme	Feedback	Response
		<ul style="list-style-type: none"> <li>The staging and timing of open space delivery will be confirmed through future approvals and detailed design processes.</li> </ul>
<b>Community facilities and activities</b>	<ul style="list-style-type: none"> <li>Strong emphasis on the need for accessible, welcoming and well-distributed community facilities that are integrated into everyday movement.</li> <li>Desire for flexible, multi-purpose spaces that can be programmed and adapted over time.</li> <li>Importance of facilities supporting health, wellbeing, social connection and ageing in place.</li> </ul> <p>Concern that spaces could feel unsafe or underused without active programming and management</p>	<ul style="list-style-type: none"> <li>The proposal identifies locations for community facilities and establishes a flexible framework for their delivery as part of the redevelopment.</li> <li>Community facilities are intended to be accessible, welcoming and integrated into everyday movement patterns across the precinct.</li> <li>Detailed design, programming, management and staging of facilities will be resolved through future development applications in consultation with City of Sydney, Homes NSW, CHPs and service providers.</li> <li>Ongoing engagement will inform how facilities are activated and adapted over time to respond to community needs.</li> </ul>
<b>Impacts on neighbouring properties</b>	<ul style="list-style-type: none"> <li>Concerns regarding privacy, overlooking, overshadowing, wind, noise and edge conditions.</li> <li>Requests for clear, easy-to-understand technical information to explain impacts.</li> <li>Construction-related concerns, including noise, dust, safety, pests, site management and the treatment of vacant buildings.</li> <li>Clarification sought regarding property acquisition and impacts on existing neighbours.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to neighbouring properties have been address as a concept level with further investigation to occur at detailed application stage.</li> <li>As outlined in Section 9.0 all impacts are capable of being managed subject to the implementation of the recommended mitigation measures.</li> </ul>

## 8.3 Future Engagement

### Statutory Exhibition

In accordance with Division 2, Section 9 of the EP&A Act, the application will be publicly exhibited for a minimum of 28 days following its submission to the Department. The exhibition will provide the community, stakeholders and government agencies with a further opportunity to review the proposal and make formal submissions. The project team will then prepare a Submissions Report which responds to any further matters raised by the community and Government agencies during this period.

### Ongoing Stakeholder Engagement

Engagement will remain central as Waterloo South progresses from concept approval into more detailed planning and delivery. The project team will continue to consult and engage with key stakeholders throughout the exhibition and assessment period of the project.

Subject to approval, the planning for detailed development applications for individual stages of the redevelopment are anticipated to commence in early 2026. These applications will include detailed architectural design, public domain works, infrastructure delivery and site-specific technical studies, and will be publicly notified in accordance with statutory requirements.

The project team will continue to consult with key stakeholders throughout assessment and delivery, including government agencies, City of Sydney, utility providers and service organisations. Ongoing engagement with tenants, neighbouring residents and the wider community will inform detailed design development, staging, interface treatments and operational planning as the project progresses.

Overall, the staged planning and delivery approach ensures that community and stakeholder feedback continues to inform detailed outcomes over time, while delivering the precinct-wide benefits established through the concept SSSA and Rezoning Proposal.

## 9.0 Assessment of Impacts

This section assesses and responds to the environmental impacts anticipated as a result of the proposed concept development. Reference is made to both an assessment of the proposed building envelopes which are sought to be approved within this concept SSDA, and where appropriate the reference scheme presented in **Section 6.3**.

This section addresses the matters for consideration set out in the SEARs (refer to Appendix B). The consolidated list of mitigation measures in **Appendix C** complement the findings of this section and will inform future detailed applications which will seek consent for the construction and operation of the development (outside of the scope of this concept SSDA).

### 9.1 Designing with Country

The concept proposal has been developed in accordance with a Designing with Country (DwC) approach that recognises Waterloo South as unceded Gadigal Country and acknowledges the enduring cultural, spiritual and social connections of Aboriginal people to this place. The proposal is informed by the *Waterloo South Designing with Country Strategic Framework* prepared by Nguluway DesignInc in collaboration with Aboriginal stakeholders and design professionals (**Appendix I**).

The DwC framework establishes a Country-led foundation for the planning and design of Waterloo South, moving beyond symbolic representation to embed Aboriginal knowledge, narratives and values into the spatial structure, public domain, landscape strategy and future built form. The concept proposal responds to this framework at a precinct scale, setting clear principles and opportunities to be further realised at subsequent design stages.

#### Country-led design principles

The proposal aligns with the guiding principles identified through consultation and analysis, including Belonging, Truth-telling, Caring, Empowerment, Pride and Resilience. These principles inform the overall structure of the precinct, the location of civic and community spaces, and the way buildings and landscapes engage with the ground plane and each other.

The concept proposal acknowledges Waterloo's role as a place of refuge, resistance and resilience for Aboriginal communities, particularly its proximity to Aboriginal Redfern and long-standing community institutions. The design framework seeks to reinforce this identity by supporting visible, accessible and culturally safe spaces for gathering, learning, enterprise and everyday use.

#### Spatial response

At a precinct scale, the proposal responds to key Country narratives identified in the DwC framework, including historic waterways, movement routes and the natural "fold" of the land between wet and dry Country. These narratives inform:

- the alignment of streets, through-site links and pedestrian connections;
- the distribution and framing of public open spaces; and
- the transition in built form, landscape character and material expression across the site.

The proposed movement network supports cultural connectivity by linking open spaces, community facilities and key streets, reinforcing Waterloo South as part of a broader cultural landscape rather than an isolated redevelopment.

#### Public domain and landscape integration

Landscape design is a primary mechanism for embedding DwC principles. The concept proposal establishes a connected network of streets, parks and green links that create opportunities to express water stories, ecological repair and seasonal change. The landscape framework supports deep soil planting, habitat creation and microclimate improvement while also providing places for gathering, ceremony, reflection and everyday use.

The DwC framework also informs future opportunities for interpretive elements, public art, naming strategies and storytelling within the public domain. These elements are intended to support truth-telling and learning while remaining embedded within functional, well-used spaces rather than isolated features.

**Ongoing collaboration and future stages**

The concept proposal establishes a robust framework for ongoing collaboration with Aboriginal communities as the project progresses. Detailed design stages will provide further opportunities to refine built form, landscape, materials and programming in alignment with the DwC framework, including through artist briefs and an Aboriginal Interpretation Strategy.

Overall, the concept proposal demonstrates a genuine and integrated Design with Country approach that respects Gadigal Country, acknowledges the cultural significance of Waterloo, and establishes a strong foundation for culturally informed, inclusive and place-responsive outcomes over the life of the project.

**9.2 Design Quality and Design Excellence**

The concept SSDA is supported by a Design Excellence Strategy (DES), as outlined in **Section 6.5.1** of this EIS. The DES outlines the means for future detailed development to achieve design excellence across the site in accordance with a consistent framework.

Further to the provision of a revised DES, the following section considers how the building envelopes proposed in the concept SSDA themselves can facilitate the achievement of design excellence across Waterloo South.

The proposed building envelopes and overall structure plan for Waterloo South provides a cohesive precinct that achieves design excellence in accordance with the objectives and requirements of clause 6.21C of the Sydney LEP 2012. The proposed building envelopes have been carefully prepared to maximise the delivery of permissible GFA and enable the achievement of the anticipated dwelling numbers across the site, while maintaining and where possible enhancing residential amenity, environmental performance, and public domain outcomes when compared with the envelopes approved under PP-2021-3625 and the 2022 Design Guide.

**Table 27** provides an assessment of the proposed building envelopes, and where relevant using the reference scheme and concept landscape plans, against the matters for consideration under clause 6.21C of the Sydney LEP 2012 and demonstrates that the concept SSDA achieves a high standard of design excellence.

**Table 27** Assessment against design excellence considerations

Matters for Consideration	Assessment
<i>whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved</i>	While detailed materiality and fine-grain detailing will be resolved through the ongoing design development process and the preparation of future detailed applications, the reference scheme demonstrates the capacity of the proposal to deliver a high-quality architectural outcome. This is facilitated through diversity of building forms across the site, the proposed DES which includes design review at the detailed design phases, and design principles and objectives in the proposed Design Guide updates.
<i>whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain</i>	<p>The proposed building envelopes maintain, and in some cases improve, the intended quality and amenity of the public domain when compared to the envelopes originally proposed under the 2022 Design Guide. Notably the proposed building envelopes accommodate all the GFA that is permissible on the site under the Sydney LEP but not enabled through the 2022 Design Guide, and as such maintaining a consistent level of amenity for the public domain between the schemes is a positive outcome of the revised structure plan.</p> <p>The proposed building envelopes directly address identified issues of the 2022 Design Guide associated with excessive street wall heights, continuous building mass, limited solar access and constrained pedestrian comfort. As is discussed in <b>Sections 9.3 to 9.5</b> and within the Design Report at <b>Appendix F</b> the following key design moves have been made to improve the public domain:</p> <ul style="list-style-type: none"> <li>• Reduced street wall heights and lengths result in a more human-scaled streetscape and improved daylight penetration to streets and open spaces.</li> <li>• Refined tower forms and redistributed building mass improve visual permeability, reduce bulk and enhance the legibility of the public domain.</li> <li>• Solar access to streets, parks and communal open spaces is improved, contributing to increased comfort and usability of the public realm.</li> <li>• Retention of existing trees, delivery of deep soil zones and provision of communal open space are maximised and aligned with the revised Design Guide where possible.</li> <li>• The active frontage strategy is largely retained, reinforcing George Street as the primary activity spine and supporting a vibrant, safe and engaging public domain.</li> </ul>

Matters for Consideration	Assessment
	<ul style="list-style-type: none"> <li>Building articulation, setbacks and breaks in form create more varied and engaging street edges, replacing long, continuous façades.</li> </ul> <p>Overall, the form and external appearance of the proposed development deliver a clear improvement to public domain quality, pedestrian comfort and environmental performance relative to the 2022 Design Guide scheme.</p>
<p><i>whether the proposed development detrimentally impacts on view corridors</i></p>	<p>The site is located outside of documented view corridors. Additionally, the concept proposal has been designed to maximise city views across the precinct and deliver equitable access to outlook for residents across different tenures. This is further detailed in <b>Section 9.4</b> and within the Design Report at <b>Appendix F</b> and the Visual Impact Assessment at <b>Appendix P</b>.</p>
<p><i>how the proposed development addresses the following matters—the suitability of the land for development,</i></p>	<p>As is outlined in <b>Section 3.0</b> and <b>10.8</b> of the EIS, the site reflects the most suitable location for the proposed redevelopment. The proposal leverages substantial recent and planned State investment in the Eastern City, including the Waterloo metro station, upgrades to Redfern station, and ongoing investment in active networks.</p> <p>The project facilitates the replacement of housing stock at its end of life and provide housing with significantly enhanced amenity for existing residents who return to the precinct and new residents moving in. The increased delivery of housing across the precinct will address in part the significant demand for social and affordable housing in the City of Sydney. The inclusion of affordable rental housing will support key workers and low- to moderate-income households, promoting socio-economic diversity within the precinct.</p>
<p><i>the existing and proposed uses and use mix</i></p>	<p>As is discussed in <b>Section 3.0</b>, Waterloo South is currently characterised by a predominantly residential public housing estate comprising low rise slab-block and tower buildings dating from the 1950s to 1970s. While the estate continues to provide important social housing, the existing land use pattern is limited in diversity and does not fully capitalise on the site’s highly accessible inner-city location or proximity to the Waterloo metro station. The current arrangement of buildings, open space and internal roads results in a fragmented public domain with limited ground-level activation, weak pedestrian connectivity and ageing community infrastructure.</p> <p>The concept proposal introduces a more balanced and intentional land use mix that retains housing as the primary use while integrating renewed community facilities, active ground-floor uses and supporting non-residential activities in key locations. This mix is designed to create a more complete and functional neighbourhood, improve public domain activation and safety, and better support the daily needs of residents. Overall, the proposed land use mix represents a significant improvement on the existing conditions and is appropriate to the site’s strategic location, accessibility and role within the inner-city context.</p>
<p><i>any heritage issues and streetscape constraints</i></p>	<p>Several heritage items are located within Waterloo South and the surrounding areas. Whilst no physical works are proposed at concept stage that will impact these items, the proposed impacts of the future built form has been considered and is outlined in <b>Section 9.10</b> of the EIS and the Statement of Heritage Impact at <b>Appendix X</b>.</p>
<p><i>the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers, existing or proposed, on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form</i></p>	<p>The location of the proposed towers has been informed by detailed design testing and is addressed further in <b>Sections 9.3</b> to <b>9.5</b> of this EIS. Towers are strategically concentrated in areas capable of accommodating increased height, including along McEvoy Street and adjacent to Waterloo Park, while lower-scale forms are provided at sensitive interfaces.</p> <p>Tower siting, separation and setbacks are consistent with ADG objectives and ensure acceptable levels of solar access, privacy, outlook and residential amenity both within the site and in relation to surrounding development. Towers are recessed above six-storey street walls, reducing perceived bulk at street level and supporting a human-scaled public domain.</p> <p>Overall, the distribution and spacing of towers achieve an appropriate relationship with existing and future development, contributes to a coherent skyline and delivers a high-quality urban form outcome.</p>
<p><i>the bulk, massing and modulation of buildings</i></p>	<p>The concept proposal seeks consent for the maximum extents of building envelopes, which establish clear upper limits to development while allowing flexibility at the detailed design stage. The bulk and massing of the concept envelopes aims to provide a more consistent and equitable approach to tenures compared to the 2022 Design Guide which was not a consideration at the time.</p>

Matters for Consideration	Assessment
	<p>Bulk and massing are managed through varied building heights, a consistent six-storey street wall and recessed upper levels, reducing perceived scale at street level and improving public domain amenity.</p> <p>Building modulation is achieved through setbacks and articulation in response to streets, open space and adjoining development, ensuring a cohesive urban form and acceptable residential amenity, as detailed further in <b>Sections 9.3</b> of this EIS.</p>
<i>street frontage heights</i>	As is discussed in <b>Sections 9.3</b> of the EIS, the street frontage heights originally proposed under the 2022 Design Guide have been reduced in the concept scheme, to improve human scale, and solar access to the public domain.
<i>environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity</i>	Environmental amenity impacts including visual impacts, wind impacts and overshadowing have been considered within <b>Section 9.4</b> of the EIS, with noise impacts addressed in <b>Section 9.15</b> .
<i>the achievement of the principles of ecologically sustainable development</i>	A precinct wide Ecologically Sustainable Development Strategy has been prepared to guide the redevelopment of Waterloo South from concept stage through the detailed applications and delivery stages. The concept proposal establishes sustainability targets which are to be adhered to as is discussed in <b>Section 6.5.8</b> and <b>Section 9.18</b> .
<i>pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of any pedestrian network</i>	<p>The concept proposal establishes the key movement and access routes for pedestrians, cyclists, vehicles and servicing throughout Waterloo South, consistent with the movement framework outlined in <b>Sections 6.2.8</b> and <b>Section 9.14</b> of this EIS. The proposed network prioritises pedestrian permeability and legibility, with a fine-grain system of streets, through-site links and open space connections that improve east–west and north–south movement across the precinct.</p> <p>Vehicular access and servicing are accommodated via a clear street hierarchy and consolidated access points to minimise conflict with pedestrian and cyclist movement. Dedicated and shared cycle routes are integrated within the street network and public domain, supporting active transport and connectivity to surrounding streets and the Waterloo metro station. Overall, the proposed circulation framework delivers a highly permeable, safe and functional movement network appropriate to the scale and intensity of the development.</p>
<i>the impact on, and any proposed improvements to, the public domain</i>	The concept SSDA identifies areas that will be subject to public domain improvements which will be delivered as part of the concept development and as required by the executed VPA. Such public domain improvements include the delivery of new and the extension of existing public roads, delivery of new public open spaces, provision of through-site links and publicly accessible spaces, and a tree retention strategy and new landscaping proposed across the precinct. Key landscaping and public domain works proposed across the site are discussed in <b>Section 9.6</b> .
<i>the impact on any special character area</i>	N/A – the site is not located within an identified special character area in the Sydney LEP 2012.
<i>achieving appropriate interfaces at ground level between the building and the public domain</i>	Appropriate ground-level interfaces will be achieved through the distribution of active uses along active frontages, consistent street wall heights, generous setbacks and integrated landscape treatment, as detailed in <b>Sections 9.3</b> . Buildings are designed to positively define streets and public spaces, provide passive surveillance and support pedestrian comfort, while landscaped thresholds and building articulation mediate transitions between public and private realms. Overall, the proposal delivers a high-quality and well-integrated relationship between built form and the public domain.
<i>excellence and integration of landscape design</i>	<p>The concept proposal integrates landscape design as a fundamental component of the overall urban design and public domain framework, as detailed in <b>Sections 9.6</b> and the Landscape Design Report at <b>Appendix F</b>. The landscape strategy is closely coordinated with built form, movement networks and land use to support pedestrian comfort, CPTED principles, amenity, ecological performance and place identity.</p> <p>A connected network of streets, parks, green links and landscaped setbacks is proposed to improve permeability, soften built form, enhance microclimate outcomes and provide high-quality public and communal open spaces. Overall, the landscape design demonstrates a high level of integration and contributes to a cohesive, legible and high-quality urban environment.</p>

## 9.3 Urban Design, Bulk and Scale

The concept SSDA is considered to achieve a high-quality built form and urban design outcome that is consistent with the vision for Waterloo South and responds appropriately to the surrounding context. The proposed building envelopes have been developed through extensive design testing including solar access modelling, sky view assessment, and iterative envelope refinement. A detailed Urban Design Report prepared by SJB (**Appendix F**) documents this testing and provides supporting analysis of the proposed building envelopes and proposed Design Guide updates.

The proposed building envelopes (**Appendix JJ**) are also supported by a reference scheme which demonstrates how buildings that comply with the proposed maximum FSR and height of building development standards may be delivered within the parameters of the building envelopes. The reference scheme demonstrates that an acceptable building form can be delivered within each of the building envelopes.

### 9.3.1 Development Blocks and Urban Structure

The site contains 10 development blocks (including 1 block to become a public park) which align with the street block layout, to support staged delivery and to provide a clear framework for the distribution of built form, land uses, open space and public domain connections.

The proposed urban structure establishes a permeable and legible neighbourhood layout, with development blocks arranged to support a high-quality public domain and strong pedestrian connectivity. The distribution of built form and open space is designed to:

- define and activate key street edges, particularly along George Street and Cooper Street;
- create a coherent network of streets, links and through-site connections that improves permeability across the precinct; and
- integrate a range of public and semi-public spaces, including landscaped courtyards and green interfaces, that contribute to an inclusive community-oriented public domain.

Built form typologies are based on consistent design principles that prioritise solar access, building separation and cross-ventilation outcomes. This approach supports equitable residential amenity across all tenures and enables a consistent and coherent precinct character. The proposed development blocks, urban structure and indicative envelopes are documented in the Urban Design Report and Concept Envelope Plans prepared by SJB (**Appendix F** and **Appendix JJ**) and illustrated in **Figure 31** and **Figure 39** to **Figure 45**.

### 9.3.2 Building Height, Bulk and Scale

The proposed building height strategy has been developed through detailed design testing to improve public domain amenity, residential amenity and overall urban design outcomes when compared with the envelopes established in the 2022 Design Guide.

Across the precinct, the proposal distributes built form to achieve an appropriate relationship with the surrounding context and a varied skyline. Key components of the height and massing strategy include:

- concentration of the tallest buildings along McEvoy Street and north of Waterloo Park as is consistent with the Design Guide, where broader street widths and open space can better accommodate increased scale;
- a graduated stepping down of heights toward surrounding lower-scale residential areas to provide appropriate transitions and reduce visual and overshadowing impacts; and
- redistribution of built form from continuous mid-rise massing into lower street walls with recessed and more slender tower elements to reduce perceived bulk and improve sky view and daylight penetration.

Mid-rise buildings (generally approximately 7–14 storeys) provide the predominant built form across much of the precinct and assist in transitioning between lower-scale forms and taller buildings. Taller elements are generally concentrated toward the southern portion of the precinct, with an additional taller element within Block 7, contributing to skyline variation while managing impacts to surrounding areas.

#### Street wall and tower form

The 2022 Design Guide envisaged street wall heights of approximately 9–11 storeys. Design testing demonstrated that increased massing at the street edge would result in excessive street wall heights, reduced sunlight penetration and diminished pedestrian comfort. In response, the concept proposal adopts a consistent six-storey street wall across the precinct.

This approach:

- establishes a more human-scaled streetscape and improves pedestrian comfort;
- improves solar access to streets and public spaces and enhances sky visibility;
- enhances visual continuity and legibility across the precinct; and
- supports active ground-floor uses and high-quality public domain outcomes.

Above the street wall, towers are recessed to reduce perceived bulk and clearly distinguish podium and tower elements. This enables a more slender upper built form while retaining a strong and active street edge.

### Maximum heights

Maximum envelope heights are proposed on a block-by-block basis to establish the upper limits of development while providing flexibility for detailed design at subsequent stages. The proposed maximum heights have been designed to:

- adhere to PANS-OPS requirements;
- maximise solar access to public and private open spaces;
- improve views to the sky from the public domain; and
- minimise impacts on neighbouring buildings and future development.

The proposed building envelopes align with the maximum heights proposed through the concurrent rezoning process to ensure consistency between the concept and the statutory framework, as has been outlined in **Section 7.3.5** of the EIS.

The Urban Design Report prepared by SJB (**Appendix F**) includes supporting solar access modelling and sky view analysis demonstrating the improved environmental amenity outcomes achieved through the proposed height strategy. These impacts are also addressed in **Section 9.4** of this EIS.

### Floor Space Ratio

The concept proposal is seeking consent for a maximum GFA of 282,484.64m<sup>2</sup> across Waterloo South. This maximum GFA is inclusive of the previously available design excellence bonus floor space permitted on the site.

The Architectural Design Report prepared by SJB and included at **Appendix F** clearly illustrates the proposed distribution and allocation of GFA across the site. Significant work has been undertaken as part of various design iterations of the concept scheme to ensure that the GFA proposed, which has significant material public benefit, does not have any adverse impacts and will result in an appropriate built form outcome.

The indicative distribution of land uses has also been guided by the planning agreements made with the City of Sydney, as described in **Section 4.3**, as well as the site-specific provisions of the Sydney LEP 2012 (as amended by the concurrent rezoning) which require the provision of:

- A minimum 15,000m<sup>2</sup> of non-residential floorspace.
- A minimum 5,000m<sup>2</sup> of community-related floor space at the site (included within the 15,000m<sup>2</sup> of non-residential floorspace).
- At least 26.5 per cent of the residential floorspace to be used for the purpose of social housing premises.
- At least 7 per cent of residential floorspace is to be used for the purposes of affordable housing that is owned and managed by a CHP.

As is outlined in **Section 7.3.5** of the EIS, the concept proposal demonstrates compliance with the Sydney LEP 2012 as amended by the concurrent rezoning.

### Setbacks and Public Domain Interface

Ground-floor setbacks are proposed to balance street activation, residential amenity and landscape integration across the precinct. Setback parameters establish minimum primary and secondary setbacks, generally ranging between approximately 1 metre and 12 metres, in response to varying interface conditions (**Figure 74**).

Along key activity corridors, including George Street and other streets identified for active frontages, reduced primary ground-level setbacks (generally 1–3 metres) reinforce a continuous street edge, support pedestrian-oriented uses and facilitate active frontage outcomes.

Increased primary ground-level setbacks (generally 4.5–10 metres) are provided along residential interfaces, green corridors and park edges. These setbacks accommodate deep soil zones, tree retention and planting, landscaped buffers and semi-private thresholds that mediate transitions between public and private space.

Side setbacks are incorporated where required to support building separation, landscape outcomes and servicing, with minimum side setbacks generally ranging between approximately 3–6 metres depending on interface conditions and consistent with ADG objectives.



Figure 74 Setback diagram

### Character Areas

The built form strategy establishes a cohesive precinct identity while enabling differentiation across key character areas. The ground plane integrates community facilities, creative workspaces and landscaped courtyards, supporting an active and inclusive public realm. Active frontages along George Street and Cooper Street form a cultural and activity spine that supports retail, hospitality, community-focused uses and spaces for 'Blak businesses', with through-site links improving permeability and reflecting historic water movement patterns. Character areas include:

- **George Street:** A finer-grain street character reflecting the Redfern interface, with robust podiums supporting active uses and recessed towers above six-storey street walls to maintain human scale and solar access.
- **Communities and Creative Neighbourhood:** Narrower scale built form and adaptable ground floors supporting makers, start-ups and community services, reinforcing civic function and a lively streetscape.
- **Village Neighbourhood:** Human-scaled residential streets with front doors, stoops and thresholds that provide semi-private spaces and support everyday social connection.

### 9.3.3 Materiality

The concept proposal adopts a strategy for materiality that responds to the site's topography and the narrative of the east-west transition between "Dry Country" and "Wet Country" outlined in the DwC framework, expressed through variations in facade articulation, tonal warmth and vertical/horizontal emphasis.

Materiality contributes to local identity across the precinct:

- **George Street:** Layered palette with brick bases supporting warmth and permanence and opportunities for adaptive reuse, with articulation referencing the transition between Dry and Wet Country.
- **Communities and Creative Neighbourhood:** Durable brick and textured concrete complemented by public art and planting, with water-referencing elements (where incorporated at detailed design) reinforcing ecological narratives.
- **Village Neighbourhood:** Brick bases with lighter upper elements, integrated planting and layered thresholds to support a tactile, human-scaled residential character.

Detailed architectural design, facade articulation and material outcomes will be further resolved at the detailed design stage, consistent with the approved envelopes and the proposed Design Guide updates.

## 9.4 Environmental Amenity

The concept SSDA has been developed to optimise amenity across Waterloo South, with a particular focus on access to sky and sunlight, pedestrian comfort, landscape quality and the interface between public and private spaces. The proposed built form framework is accompanied by targeted updates to the Design Guide, to ensure alignment between the Design Guide (as amended) and the concept SSDA to support the delivery of high-quality amenity outcomes at future stages.

The revised Design Guide framework responds to detailed testing of the 2022 Design Guide envelopes and typologies, which identified opportunities to improve environmental performance and amenity while accommodating the permissible GFA and intended new dwellings across the site. Key refinements include reduced street wall heights, redistribution of taller built form and enhance provision of public, communal and landscaped open spaces which have resulted in improvements to the environmental amenity compared with the conditions achievable under the 2022 Design Guide envelopes.

This section assesses environmental and residential amenity at concept level, including solar access and overshadowing, sky view and visual impacts, wind comfort, landscape and residential amenity.

### 9.4.1 Overshadowing

Solar access and overshadowing have been assessed at the concept plan level to ensure that optimal environmental amenity can be achieved across the Waterloo South precinct and to understand the potential impacts of the concept SSDA on surrounding public spaces and neighbouring residential development.

The assessment has been undertaken using the reference scheme prepared by SJB, which tests solar access outcomes achievable within the parameters of the proposed building envelopes and indicative built form.

#### Methodology

Solar analysis prepared by SJB assesses overshadowing impacts during the winter solstice, consistent with the requirements of the 2022 Design Guide, Housing SEPP and the ADG. The analysis focuses on:

- Solar access to key public open spaces, including the proposed Block 8 park, and the existing Waterloo Park and Waterloo Oval; and
- Solar access to surrounding residential flat buildings located to the south of the precinct along McEvoy Street.

Solar access to public open space has been assessed at 15-minute intervals between 9.00am and 3.00pm on the winter solstice, against the 2022 Design Guide requirement that a minimum of 50 per cent of each park receive at least four hours of direct sunlight.

Solar access to the existing McEvoy Street apartments has been assessed by measuring the proportion of dwellings achieving a minimum of two hours of direct solar access to living rooms and private open spaces. The adopted performance target is that at least 70 per cent of apartments achieve this level of solar access, consistent with ADG design criteria.

#### Existing Environment

Given the existing environment represents an underutilisation of key government-owned land for housing, the results of the solar analysis have been instead compared with the solar access outcomes that would have been achieved under the 2022 Design Guide.

Under the 2022 Design Guide scenario, the following solar access outcomes were recorded:

- **Block 8 Park:** 48.34 per cent of the area achieving more than four hours of sunlight
- **Waterloo Park:** 63.31 per cent of the area achieving more than four hours of sunlight
- **Waterloo Oval:** 96.77 per cent of the area achieving more than four hours of sunlight

This analysis demonstrates that while Waterloo Park and Waterloo Oval achieved the minimum benchmark, Block 8 Park did not meet the required minimum of 50 per cent of the park receiving four hours of sunlight.

To the south of McEvoy Street are a series of medium-density residential flat buildings. Solar access testing undertaken using the 2022 Design Guide building envelopes confirms that none of the three buildings would achieve the ADG design criteria of a minimum of 70 per cent of apartments to receive at least two hours of direct sunlight to primary living rooms and/or private open space between 9.00am and 3.00pm at the winter solstice.

Using the 2022 Design Guide envelopes, the following proportion of apartments achieved a minimum of two hours of solar access:

- **52–54 McEvoy Street:** 68.18 per cent
- **40–46 McEvoy Street:** 42.67 per cent
- **34–38 McEvoy Street:** 69.41 per cent

These outcomes reflect existing site constraints, predominantly southern orientation of the buildings, combined with overshadowing from established surrounding development. This limits the potential for the proposed building envelopes and reference scheme to achieve solar access that is consistent with the design criteria of the ADG while maintaining the permitted GFA and intended quantum of residential dwellings across the site.

### Assessment

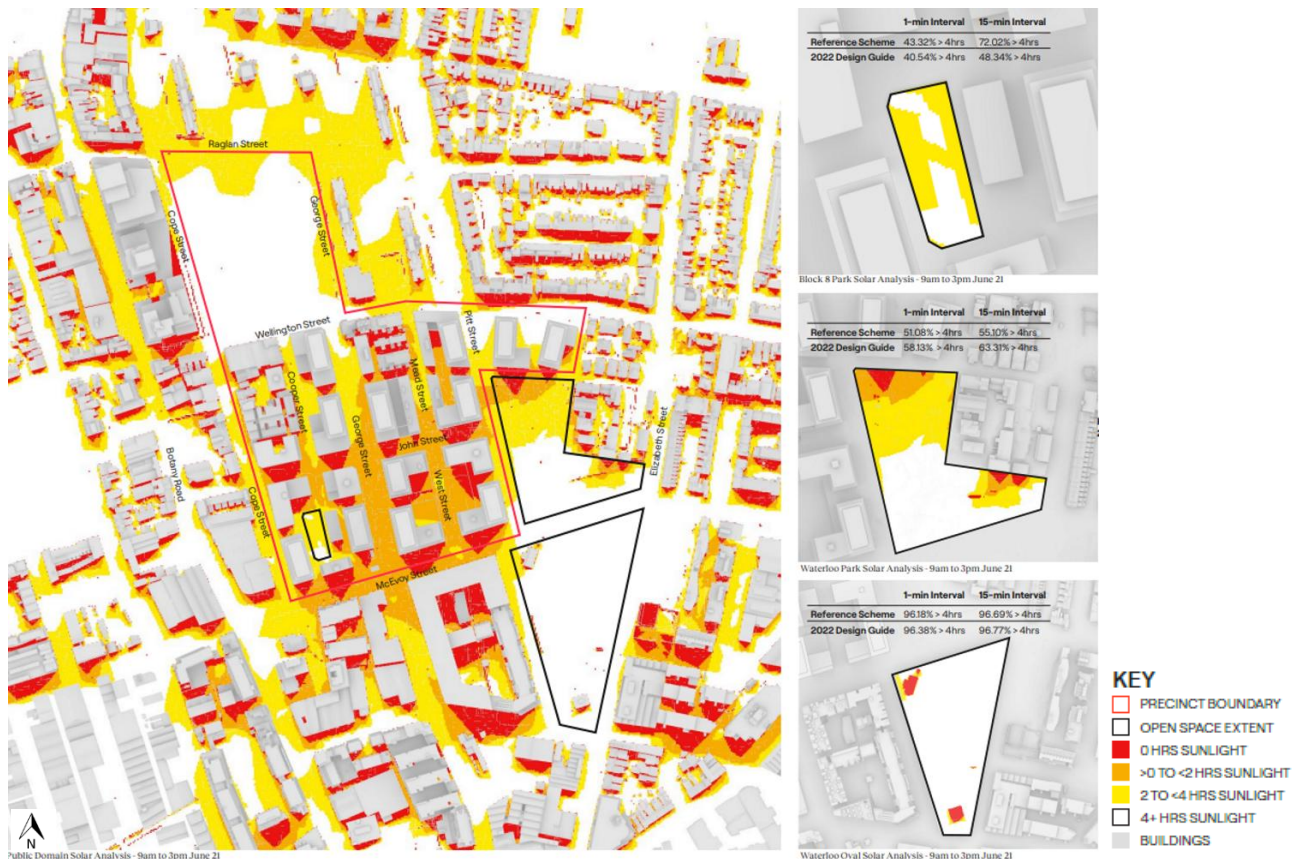
Refinements to the proposed built form under the concept SSDA have been undertaken to improve solar access to areas of highest community use and to ensure compliance with the 2022 Design Guide performance criteria. As a result of these refinements, the solar access outcomes under the reference scheme are as follows:

- **Block 8 Park:** 72.02 per cent of the area achieving more than four hours of sunlight
- **Waterloo Park:** 55.10 per cent of the area achieving more than four hours of sunlight
- **Waterloo Oval:** 96.99 per cent of the area achieving more than four hours of sunlight

This analysis has been calculated at 15 minute intervals as required by the ADG. The analysis confirms that all key public open spaces meet the minimum requirement that at least 50 per cent of each park receives four hours of direct sunlight between 9.00am and 3.00pm at the winter solstice. Notably, Block 8 Park demonstrates a substantial improvement compared to the 2022 Design Guide scenario, while Waterloo Park and Waterloo Oval continue to achieve compliant outcomes.

While the refined built form results in some localised increases in shadow extent, these changes are purposeful and facilitate improved sunlight access to spaces with the highest levels of pedestrian activity and community use. In particular, enhanced solar access is achieved along Cooper Street, within the new Block 8 Park, and across a range of communal open spaces between buildings.

Across the broader public domain, the redistribution of built form reduces extensive continuous overshadowing associated with longer street walls and enables greater penetration of sunlight into key pedestrian corridors and gathering spaces. Overall, the proposed structure plan and detailed reference scheme delivers improved solar access outcomes relative to the 2022 Design Guide framework, while maintaining acceptable amenity across the precinct.



**Figure 75** Public domain solar analysis

Overshadowing impacts to the existing McEvoy Street residential developments have also been assessed at a concept level using the reference scheme. The analysis indicates that the redistribution of built form under the concept plan results in changes to the pattern of solar access when compared to the 2022 Design Guide scenario. Across the three existing residential buildings modelled, there is a modest reduction in the proportion of dwellings receiving two or more hours of direct sunlight, ranging from approximately 1 to 12 per cent. These reductions are most apparent at lower levels and in dwellings located in the internal courtyards of the developments.

Conversely, the proportion of dwellings receiving between zero and two hours of direct sunlight generally increases, indicating that some exiting dwellings will experience shorter durations of sunlight rather than a complete loss of solar access. Importantly, the proportion of dwellings receiving zero hours of direct sunlight remains unchanged at two of the three sites and increases only marginally at 40–46 McEvoy Street. This confirms that the proposed built form does not result in widespread solar deprivation to surrounding residential development.

At 34–38 McEvoy Street, while the proportion of dwellings receiving two or more hours of sunlight decreases, there is a corresponding increase in dwellings receiving between zero and two hours, with no increase in dwellings receiving zero hours. This outcome reflects a redistribution of solar access rather than a substantive worsening of residential amenity.

The anticipated solar access outcomes for the modelled existing apartments under the reference scheme are as follows:

- **52–54 McEvoy Street:** 60.61 per cent
- **40–46 McEvoy Street:** 40.95 per cent
- **34–38 McEvoy Street:** 57.65 per cent

The solar analysis demonstrates that the existing residential buildings on McEvoy Street do not currently meet the 70% minimum 2 hour solar access requirements. The proposed development will alter the solar access achieved to certain apartments along McEvoy Street. Importantly, the proposed development will not reduce solar access to these apartment buildings by more than 20% in accordance with the design guidance provided under objective 3B-2 of the ADG.



52-54 McEvoy Street				40-46 McEvoy Street				34-38 McEvoy Street			
	REF. SCHEME	2022 DESIGN GUIDE	DIFFERENCE		REF. SCHEME	2022 DESIGN GUIDE	DIFFERENCE		REF. SCHEME	2022 DESIGN GUIDE	DIFFERENCE
2HRS+ SUN TO LIVING ROOMS AND PRIVATE OS	60.61%	68.18%	-7.58%	2HRS+ SUN TO LIVING ROOMS AND PRIVATE OS	40.95%	42.67%	-1.72%	2HRS+ SUN TO LIVING ROOMS AND PRIVATE OS	57.65%	69.41%	-11.76%
2HRS+ SUN TO LIVING ROOMS OR PRIVATE OS	18.18%	21.21%	-3.03%	2HRS+ SUN TO LIVING ROOMS OR PRIVATE OS	10.78%	11.64%	-0.86%	2HRS+ SUN TO LIVING ROOMS OR PRIVATE OS	32.94%	23.53%	+9.41%
>0 & <2HRS SUN TO LIVING ROOMS AND PRIVATE OS	15.15%	4.55%	+10.61%	>0 & <2HRS SUN TO LIVING ROOMS AND PRIVATE OS	8.62%	6.47%	+2.16%	>0 & <2HRS SUN TO LIVING ROOMS AND PRIVATE OS	7.06%	4.71%	+2.35%
>0 & <2HRS SUN TO LIVING ROOMS OR PRIVATE OS	0.00%	0.00%	0.00%	>0 & <2HRS SUN TO LIVING ROOMS OR PRIVATE OS	20.69%	21.55%	-0.86%	>0 & <2HRS SUN TO LIVING ROOMS OR PRIVATE OS	0.00%	0.00%	0.00%
0HRS SUN TO LIVING ROOMS AND PRIVATE OS	6.06%	6.06%	0.00%	0HRS SUN TO LIVING ROOMS AND PRIVATE OS	18.97%	17.67%	+1.29%	0HRS SUN TO LIVING ROOMS AND PRIVATE OS	2.35%	2.35%	0.00%

Figure 76 Solar analysis to surrounding existing dwellings

### Conclusion

Overall, the solar access and overshadowing assessment confirms that the proposed concept SSDA, supported by targeted refinements to the built form and associated updates to the 2022 Design Guide, optimises environmental amenity outcomes across the precinct. The proposal achieves compliant and improved solar access to key public open spaces and the public domain, while resulting in only localised and incremental changes to solar access for surrounding residential development. Detailed consideration of solar access and overshadowing impacts will continue to be undertaken at future detailed SSDA stages to ensure appropriate resolution at the building scale.

### 9.4.2 Sky View

A sky view analysis has been undertaken to assess the average proportion of sky visible from the public domain, consistent with the methodology set out in the Sydney DCP (Schedule 12.2, Procedure B) as well as objective 8.3(c) within the 2022 Design Guide to “increase the view of the sky from public space”. The analysis indicates that the proposed concept development achieves an improvement in sky view across the precinct compared to the 2022 Design Guide envelopes.

The analysis indicates an increase in the ‘Sky View Index’ from approximately 43.88 per cent under the 2022 Design Guide envelope to 43.97 per cent under the proposed concept development. Whilst the numerical increase is modest, in the context of a tool that typically measures to 3 or 4 decimal points, the increase is quite significant and is achieved whilst accommodating the permissible development capacity within the precinct.

The improved outcome is attributable to refinements to built form massing, including reduced and more consistent street wall heights and the redistribution of taller elements away from key public domain interfaces. These changes align with a key objective of the revised Design Guide, which seeks to reduce the apparent height of buildings and increase views of the sky from streets, parks and pedestrian spaces.

Overall, the analysis confirms that the proposed concept development improves sky view outcomes relative to the 2022 Design Guide envelope, despite accommodating greater built form, and supports acceptable visual amenity within the public domain.



Figure 77 Comparison of Sky View Index from the public domain

### 9.4.3 Visual Impacts

A Visual Impact Assessment (VIA) has been prepared by Urbis (**Appendix P**) to assess the potential visual impacts associated with the concept development for Waterloo South. As the concept SSDA seeks approval for maximum built form parameters rather than a detailed architectural design, the assessment has been undertaken using a reference scheme prepared by SJB.

The reference scheme represents a realistic development outcome that is wholly contained within the proposed concept building envelopes and has been used as a testing tool to assess the potential visual impacts associated with the concept development. The reference scheme is illustrative only and is not proposed for approval. Detailed architectural design, materiality and façade articulation will be addressed and assessed at future detailed applications.

#### Methodology

The VIA was undertaken using Urbis' established visual impact assessment methodology, which incorporate both qualitative and quantitative analysis and is consistent with contemporary NSW practice. The assessment involved:

- Identification of the visual catchment and representative public and private viewpoints;
- Fieldwork to document existing visual conditions;
- Preparation of verified photomontages illustrating the reference scheme prepared within the concept envelopes, and
- Assessment of visual effects having regard to view sensitivity, viewing distance, visual absorption capacity, compatibility with the surrounding context and anticipated future character.

The baseline for assessment comprises the existing visual catchment, with comparative consideration of the 2022 Design Guide envelopes to understand the relative extent of visual change proposed at concept level.

#### Existing Environment

The Waterloo South Precinct Area is located within an established inner-city urban context characterised by a mix of low-rise residential flat buildings, medium-density development and emerging high-rise tower forms associated with recent and approved redevelopment in Waterloo, Redfern and Green Square.

The site benefits from a strong landscape framework, including mature street trees and proximity to major public open spaces such as Waterloo Park, Waterloo Oval, Redfern Park and Alexandria Park. These elements contribute significantly to the existing visual character and provide a high degree of visual filtering in many views.

The broader visual context is one of transition, with approved and emerging tall buildings associated with the Waterloo Metro Quarter and surrounding precincts forming part of the anticipated future skyline.

#### Assessment

The VIA assessed a total of twelve representative public domain viewpoints across close, medium and distant viewing distances, including views from surrounding streets, parks and transport corridors.





Overall, the assessment found that:

- the proposed concept envelopes are visually compatible with the existing and emerging high-density urban context;
- existing development, mature tree canopy and topography provide substantial visual screening in many close and medium-distance views;
- where visible, the proposed envelopes are typically perceived within a wider urban composition that includes existing and approved tower forms;
- taller buildings are generally located toward the southern portion of the precinct, reducing visual impacts on key local streets and minimising perceived bulk from sensitive public domain locations; and
- the spatial separation between tower forms avoids the appearance of a continuous wall of development and allows for visual permeability and views of open sky.

Of the viewpoints assessed, the majority were rated as having nil to low visual impact, with a limited number of locations assessed as having medium visual impact due to proximity, sensitivity of the viewing location or visibility of taller envelope forms. One viewpoint from Waterloo Oval was assessed as having a greater level of visual change due to its proximity and sensitivity; however, the overall visual impact rating is still considered to be “medium-low” as impacts were found to be consistent with those already contemplated under the 2022 Design Guide and the emerging character of the area.

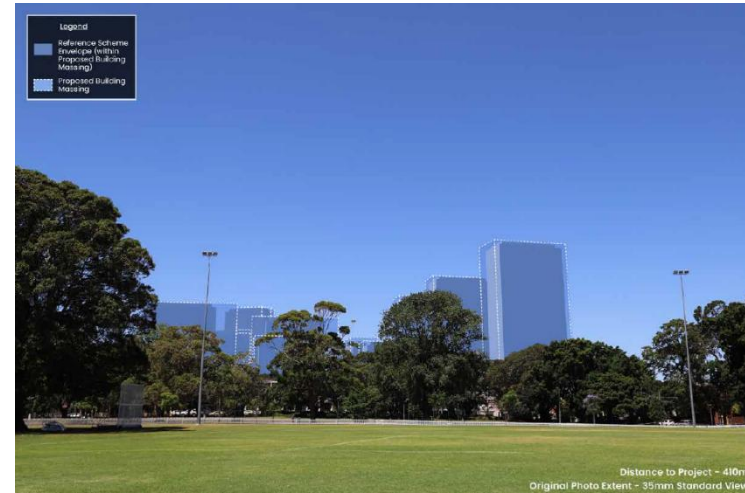
Importantly, the VIA concludes that development within the proposed concept envelopes would not block views to areas of unique scenic quality and would not result in additional visual impacts on heritage items beyond those previously considered and accepted through the strategic planning framework for Waterloo South.

**Table 28** Summary of visual impacts

View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
View 01	View from Sydney Park			Low
View 02	View north-west from Waterloo Park Oval			Medium-low

View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
------	--------------------	---------------	--------------------------------	---------------

View 03 View east from Alexandria Park




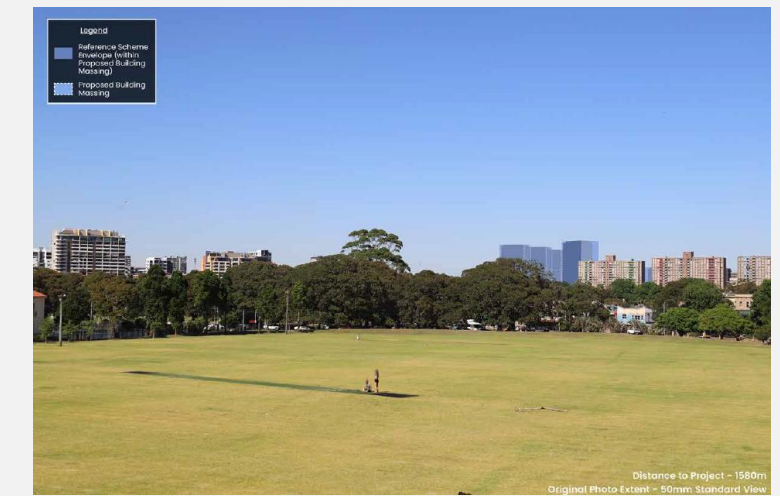


Low

View 04 View south-west from Redfern Park

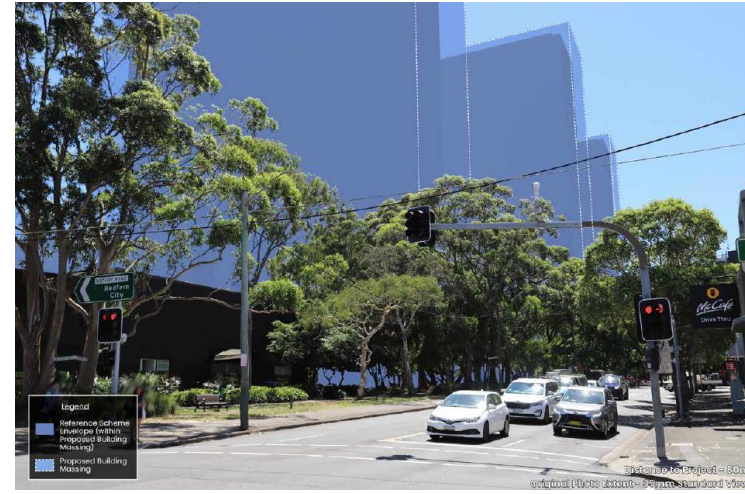


Low

View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
View 05	View south from Regent and Cleveland Street			Nil
View 06	View south-west from the Votter Walkways in Moore Park			Low

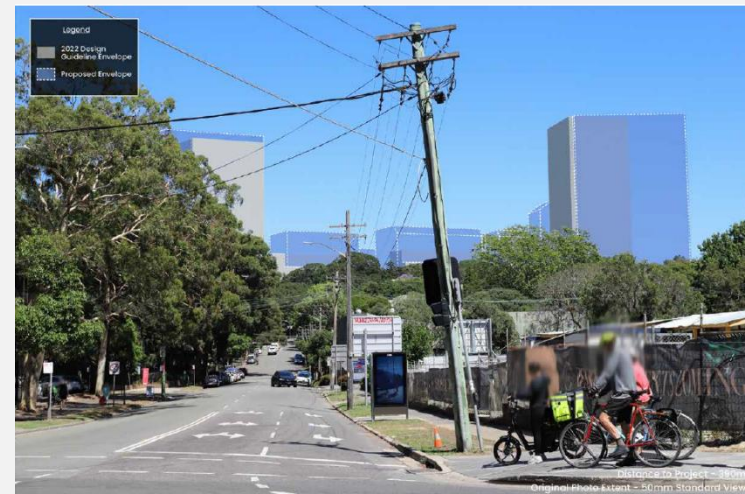
View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
------	--------------------	---------------	--------------------------------	---------------

View 07 View north at the Botany Road and McEvoy Street intersection


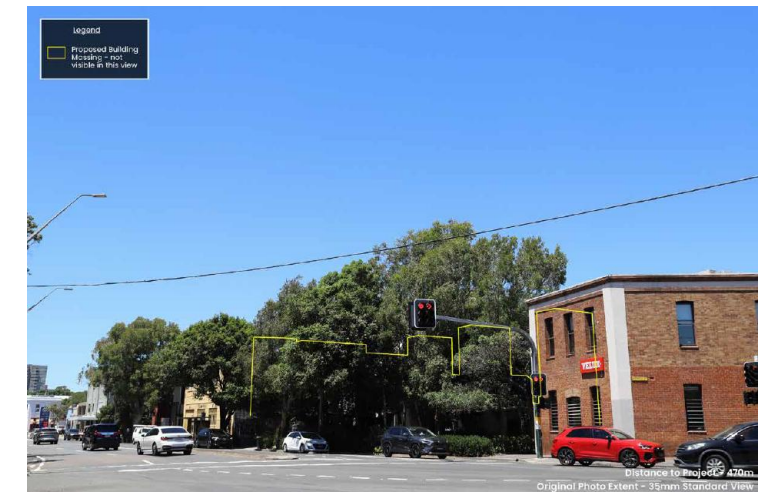








Medium

View 08 View west from the intersection of McEvoy and Bourke Street



Low

View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
View 09	View south-east from the Mitchell and Henderson Road intersection			Nil
View 10	View north-east from the Green Square train station entry			Low

View	Viewpoint Location	Existing View	View with proposed development	Visual Effect
View 11	View south from the intersection of Wellington and Cope Street			Medium
View 12	View south-east from the intersection of Raglan and Cope Street			Low

## Mitigation Measures

At the concept stage, mitigation of visual impacts is primarily achieved through the overall precinct structure, including:

- graduated building heights and strategic placement of taller forms;
- generous building separation distances;
- retention and reinforcement of the existing tree canopy; and
- integration of new development within a landscape-led public domain framework.

Further mitigation measures should be considered at detailed design stage where medium visual amenity impacts are identified. Measures can potentially address items such as; building massing, setbacks and tower separation to reduce bulk and maintain appropriate sky views. Built form articulation, material selection and podium design should respond to the local context and contribute positively to the streetscape.

These measures will enable refinement of visual outcomes and ensure that individual buildings respond appropriately to their immediate context while remaining consistent with the approved concept envelopes.

## Conclusion

The VIA demonstrates that the concept development, as tested through the reference scheme, will result in visual change consistent with the strategic planning intent for Waterloo South and its surrounding precincts. While the redevelopment will introduce taller built forms and increased density, the overall visual impacts are acceptable at concept level, compatible with the evolving urban character and capable of being appropriately managed and refined through future detailed design stages.

### 9.4.4 Pedestrian Wind

An Environmental Wind Tunnel Study (**Appendix O**) has been prepared by SLR Consulting Australia to assess the pedestrian wind environment associated with the concept development. The study assesses wind conditions at a precinct-wide scale and provides an appropriate level of analysis to inform the concept SSDA, recognising that further, building specific wind testing will be undertaken at future detailed development stages once architectural design including façade articulation and building modulation is resolved.

The assessment considers existing conditions and the reference scheme, which has been prepared to represent a realistic development outcome consistent with the concept SSDA envelopes. The reference scheme has been used to test potential pedestrian wind impacts associated with the proposed scale, massing and distribution of built form, rather than to finalise mitigation at this stage.

## Methodology

The wind assessment was undertaken using quantitative wind tunnel testing in accordance with accepted industry practice and the requirements of the Sydney DCP 2012. A 1:400 scale proximity model was constructed, incorporating surrounding buildings and terrain within approximately 900 metres of the site to accurately simulate local wind conditions.

The study tested multiple scenarios, including:

- Existing (baseline) conditions.
- The reference scheme was used to test wind impacts as it represents a realistic and deliverable development outcome within the maximum envelopes sought under the concept SSDA.

The 2022 Design Guide envelopes were included as a comparative test case however does not represent the baseline conditions. Wind conditions were assessed against:

- Pedestrian safety criteria, based on peak annual gusts; and
- Pedestrian comfort criteria, based on gust equivalent mean wind speeds at a 5% annual exceedance level.

Sensor locations were distributed across footpaths, public spaces, parks and selected elevated communal areas to capture both typical and worst-case scenarios.

## Existing Environment

The existing wind environment within and surrounding Waterloo South is influenced by a combination of low to mid-rise residential buildings, established street trees and limited exposure to higher wind speeds at ground level. The SLR assessment confirms that under the existing (baseline) conditions, no location within or surrounding the site exceed pedestrian safety criteria and most areas are suitable for sitting, standing or walking activities depending on location and exposure. These baseline conditions provide an appropriate benchmark against which the reference scheme has been assessed.

## Assessment

The wind tunnel testing demonstrates that the reference scheme does not give rise to adverse pedestrian wind conditions at a precinct-wide scale. Key findings include:

- Pedestrian safety criteria are met across all tested locations, with no exceedances of the 24 m/s safety threshold under any scenario.
- The majority of ground-level public domain areas experience wind conditions suitable for standing or walking, consistent with their intended use.
- Variations in wind comfort between locations are primarily attributable to localised building orientation, corner conditions and exposure along wider streets, rather than the overall scale of the development.

Importantly, the assessment confirms that the redistribution of built form within the concept proposal does not materially worsen pedestrian wind conditions compared to 2022 Design Guide, and in some locations provides increased shielding due to building massing and street enclosure.

The testing was undertaken without the inclusion of proposed landscaping, awnings or architectural wind mitigation features, representing a conservative assessment. As such, the results provide confidence that acceptable wind conditions can be achieved and further refined through detailed design.

## Mitigation Measures

While no unacceptable wind conditions are predicted at concept level, the SLR study identifies opportunities for targeted mitigation to be incorporated at later stages, including:

- retention and enhancement of street trees and landscape planting to reduce horizontal wind acceleration;
- use of awnings, canopies and building setbacks to manage façade downwash at key pedestrian interfaces;
- careful placement of seating, outdoor dining and communal open spaces in sheltered locations; and
- incorporation of vertical or horizontal windbreak elements where required, informed by detailed architectural design.

Elevated communal open spaces and private balconies will be subject to building-specific wind assessments at future detailed application stages, with mitigation measures refined in response to final building form, façade articulation and balustrade design.

## Conclusion

The Environmental Wind Tunnel Study confirms that the concept development, as represented by the reference scheme, can achieve acceptable pedestrian wind safety and comfort outcomes across Waterloo South. The findings demonstrate that wind impacts can be effectively managed through detailed design and mitigation at subsequent stages, consistent with best-practice urban design and the requirements of the Sydney DCP 2012.

## 9.5 Residential Amenity

The proposed Design Guide updates and proposed building envelopes have been designed to improve overall residential amenity and the equity of amenity across residential tenures from what was achievable under the 2022 Design Guide. The key observations made under the 2022 Design Guide were:

- there were several building typologies proposed across the precinct which would add complexity in terms of detailed design and delivery;
- residential typologies would require multiple cores per building, reduce efficiencies constrain design flexibility and increase costs; and
- those unique typologies were more likely to be utilised for social and affordable housing tenures whilst market housing would feature more typical built form and amenity outcomes.

The concept envelopes propose alternate and regular building typologies that enable the design, delivery of equal amenity outcomes across tenures. The reference scheme prepared by SJB outlines how a high level of residential amenity can achieve at the site as part of future detailed applications as it outlined in detail below.

### 9.5.1 Building Separation and Visual Privacy

Design Criteria 3F of the ADG recommends minimum building separation distances to support visual privacy, however building separation distances also contribute to improved view access, daylight access, ventilation and amenity of open spaces. Building separation is measured between the site boundary and either a habitable room or window, non-habitable room or window, or blank wall. For buildings within the same site, minimum separation distance should be shared equitably between buildings.

The proposed building envelopes have been designed to achieve the minimum building separation requirements under the ADG, as depicted in **Figure 78** below. Where building separation may be shown below the design criteria for habitable rooms facing habitable rooms, the reference scheme demonstrates that blank wall conditions or the orientation of apartments and windows can achieve the ADG objectives and design criteria. As such, the proposed building separation across the site is consistent with the objectives of the ADG.



**Figure 78** Building separation

Source: Design Report prepared by SJB

### 9.5.2 Solar Access

Design Criteria 4A01 of the ADG requires that living rooms and private open spaces of at least 70 per cent of apartments receive a minimum 2 hours direct sunlight between 9am and 3pm on the 21 June. Further, the ADG recommends that no more than 15 per cent of apartments should receive no direct sunlight between 9am and 3pm at mid-winter.

Solar access to residential apartments within the Waterloo South precinct has been assessed for the concept SSSA in accordance with the ADG. As the concept SSSA establishes maximum building envelopes and indicative massing rather than detailed building design, the reference scheme has been prepared to demonstrate that acceptable solar access outcomes can be achieved across the site, noting that further resolution will occur at detailed application stages.

The assessment indicates that, across the precinct, 2,647 out of 3,329 indicative apartments achieve at least two hours of direct sunlight between 9.00 am and 3.00 pm at mid-winter, which equates to 79.51 per cent and exceeds the minimum 70 per cent target under the ADG performance criteria. 9.5 per cent of apartments across the precinct receive no direct solar access which is less than the maximum 15 per cent required by the ADG.

Solar access outcomes vary across individual blocks, reflecting differences in block and building orientation, envelope constraints, proposed building heights, and proximity to surrounding development. Notwithstanding differences in the achievement of solar access across different buildings, the following table outlines how solar access has been achieved across different residential tenure types, to ensure that each tenure type (social housing, affordable housing, and market housing) can achieve a similar or equitable level of solar amenity.

As per block solar analysis has also been undertaken, to aid in the future assessment of detailed applications. This assessment is provided so that it is recognised that 70 per cent of apartments in each building (such as in buildings 2DB1, 4CB1, 6AB1, 8CB1, 8BB1, 9BB1 and 10BB1) may not achieve 2 hours of direct sunlight to living rooms and balconies, however that across the precinct an appropriate level of amenity can be achieved with some buildings and blocks over performing against the ADG design criteria.

**Table 29** Solar access performance of proposed development in mid-winter

Block	Tenure	Solar Access	Apartments achieving > than 2 hours solar access
<b>Block 2</b>	Social housing	2 hours sunlight: 55 >15 mins sunlight: 18 No direct sunlight: 21	55/ 94 = 58.5%
	<b>Block 2 total:</b> 55/94 = 58.5%		
<b>Block 3</b>	Affordable housing	2 hours sunlight: 373 >15 mins sunlight: 2 No direct sunlight: 31	373/406 = 91.9%
	<b>Block 3 total:</b> 373/406 = 91.9%		
<b>Block 4</b>	Social housing	2 hours sunlight: 86 >15 mins sunlight: 13 No direct sunlight: nil	86/99 = 86.9
	Market housing	2 hours sunlight: 132 >15 mins sunlight: 71 No direct sunlight: nil	132/203 = 65%
<b>Block 4 total:</b> 218/302 = 72%			
<b>Block 5</b>	Social housing	2 hours sunlight: 34 >15 mins sunlight: nil No direct sunlight: nil	34/34 = 100%
	Market housing	2 hours sunlight: 165 >15 mins sunlight: 5 No direct sunlight: 13	165/ 183 = 90.1%
<b>Block 5 total:</b> 199/217 = 91.71%			
<b>Block 6</b>	Social housing	2 hours sunlight: 171 >15 mins sunlight: 36 No direct sunlight: 30	171/237 = 72%
	<b>Block 6 total:</b> 171/237 = 72%		
<b>Block 7</b>	Affordable housing	2 hours sunlight: 196 >15 mins sunlight: 6 No direct sunlight: 12	196/214 = 92%
	Market housing	2 hours sunlight: 245 >15 mins sunlight: 1 No direct sunlight: 8	245/254 = 96%

Block	Tenure	Solar Access	Apartments achieving > than 2 hours solar access
			<b>Block 7 total:</b> 441/468 = 94.23%
<b>Block 8</b>	Social housing	2 hours sunlight: 201 >15 mins sunlight: 36 No direct sunlight: 9	201/246 = 81.7%
	Affordable housing	2 hours sunlight: 48 >15 mins sunlight: 12 No direct sunlight: 14	48/74 = 64.9%
	Market housing	2 hours sunlight: 210 >15 mins sunlight: 79 No direct sunlight: Nil	210/289 = 72.7%
			<b>Block 8 total:</b> 462/609 = 75.86%
<b>Block 9</b>	Social housing	2 hours sunlight:112 >15 mins sunlight: 32 No direct sunlight: 30	112/174 = 64.37%
	Market housing	2 hours sunlight: 266 >15 mins sunlight: 27 No direct sunlight: 311	266/324 = 82.21%
			<b>Block 9 total:</b> 378/498 = 75.90%
<b>Block 10</b>	Social housing (10BB1)	2 hours sunlight:120 >15 mins sunlight: 12 No direct sunlight: 57	120/189 = 63.5%
	Market housing (10AB1)	2 hours sunlight:230 >15 mins sunlight: 26 No direct sunlight: 53	230/309 = 74.6%
			<b>Block 10 total:</b> 350/498 = 70.28%
			<b>Waterloo South total: 2,647/3,329 = 79.51%</b>

Solar access is generally maximised to buildings located along the western, eastern and northern edges of the precinct, where greater access to unobstructed sky is available. More constrained outcomes occur within the central area of the site and the southern portion of the precinct, where cumulative overshadowing from surrounding development reduces solar penetration, particularly at lower levels.

Building envelopes have been deliberately crafted to prioritise and maximise solar access to the public domain, public parks and private open spaces, recognising the importance of public realm activation and the provision of high-quality private amenity. Solar access to these areas has been optimised as outlined in **Section 9.5.2**, balancing residential solar access with broader precinct-wide amenity objectives.

Where the ADG design criteria of 70 per cent of apartments achieving a minimum of two hours of direct sunlight has not been achieved at a per-building level, the outcomes can be attributed to specific built form and locational constraints, including building orientation, envelope depth, separation distances and overshadowing arising from surrounding development. These matters are discussed in further detail below.

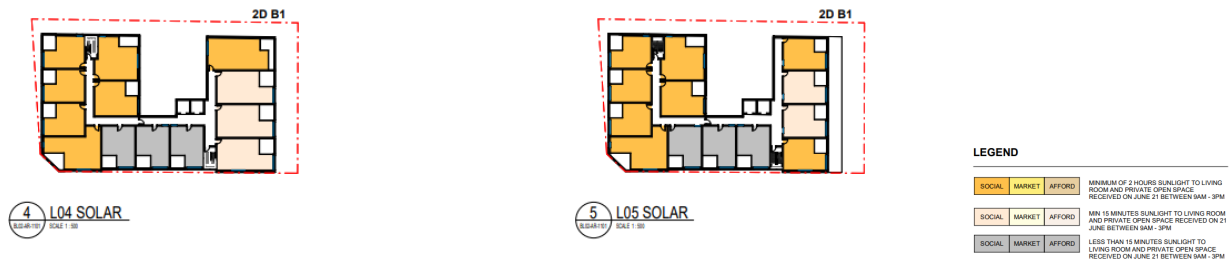
### **Block 2 – Building 2DB1**

Within Block 2, 55 of 94 apartments (58.5 per cent) in Building 2DB1 achieve the minimum two hours of solar access, which is below the ADG design criteria. Building 2DB1 is an approximately 9-storey residential building containing 55 dwellings, located on the southern portion of Block 2, fronting John Street (refer to **Figure 79**).

The reduced proportion of apartments achieving the two-hour solar access requirement arises from a combination of site-specific planning, built form, and social housing delivery considerations. The building is intended to accommodate predominantly First Nations seniors, who typically require a higher proportion of one- and two-bedroom apartments.

This dwelling mix (per agreement with Homes NSW), in conjunction with the strategic placement of deep soil landscaping to the northern interface to appropriately address the future redevelopment potential of the adjoining northern site, necessitates a building configuration in which a greater number of dwellings are positioned along the southern elevation.

Apartments with a southern aspect receive less than 15 minutes of direct sunlight from ground level through to Level 7, reflecting the building's southern location within the block and the limited opportunity for solar penetration to south-facing dwellings within the tested envelope. Apartments located within the eastern wings, where dual frontages are provided, achieve greater solar access, while the western wing achieves 100 per cent compliance from Level 3 upwards.



**Figure 79** Extract of building 2DB1 solar access  
Source: SJB

### Block 4 – Buildings 4CB1 and 4CB2

Building 4CB2 is a 9-storey residential building located along the western edge of Block 4 (refer to **Figure 80**). Reduced solar access is concentrated in apartments along the south-western portion of the building, where solar exposure is constrained by the building's orientation, envelope configuration, and overshadowing from surrounding built form under the maximum envelope scenario. As illustrated in the winter solstice, these apartments generally receive a minimum of approximately 15 minutes of direct sunlight, particularly at lower to mid levels.

Building 4CB1 is a 21-storey tower oriented on a north-south axis with a double-loaded floorplate (refer to **Figure 80**). 132/203 (65 per cent) of apartments achieve a minimum 2 hours solar access between 9am and 3pm mid-winter, which is below the ADG design criteria. The upper eight storeys achieve full compliance, benefitting from increased height above surrounding development and improved solar penetration.

Reduced solar access occurs primarily within apartments located on the southern, western and south-western sides of the tower at lower and mid levels, where solar access is constrained by mutual overshadowing from other buildings within the block. Apartments with northern and eastern aspects perform more strongly overall, but some remain constrained at lower levels due to the cumulative effects of surrounding built form tested at the concept envelope stage.



**Figure 80** Extract of Block 4 solar access  
Source: SJB

## Block 8 – Building 8CB1 and 8BB1

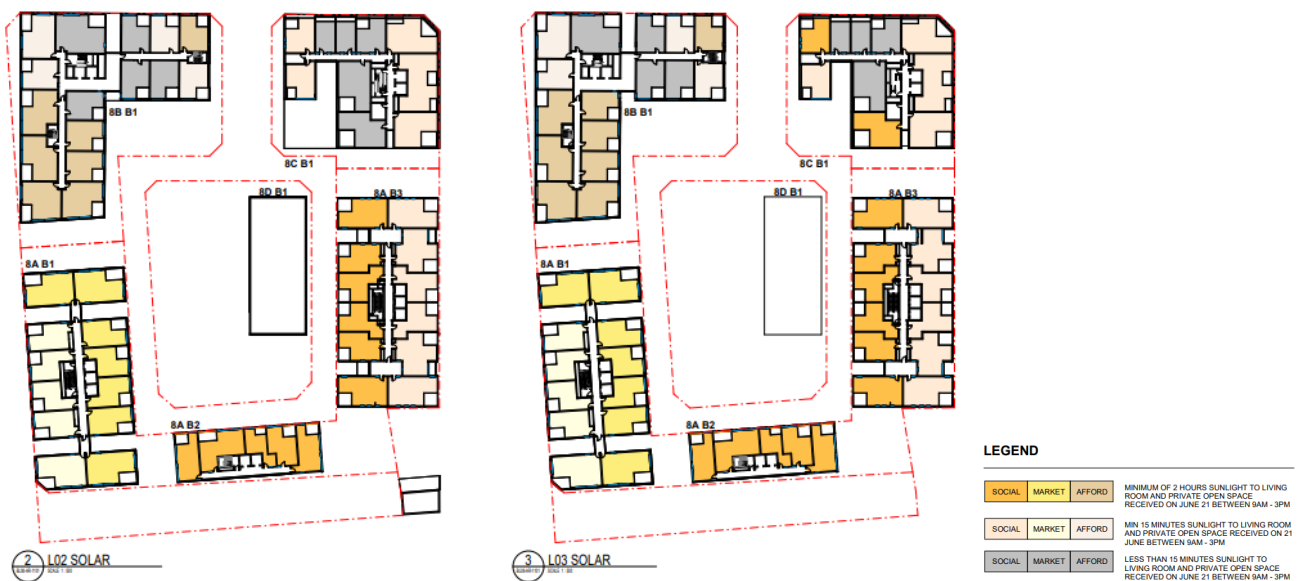
Block 8 is located within the south-western portion of Waterloo South, where solar access is inherently more constrained due to the block’s position relative to the broader precinct massing and orientation (refer to **Figure 81**). As the southern and western extents of the precinct are subject to increased mid-winter overshadowing from surrounding development, blocks in this location experience reduced access to unobstructed northern and western sky compared to sites along the northern and eastern edges of the precinct.

Block 8 is located within the south-western portion of Waterloo South, where solar access is inherently more constrained due to the block’s position relative to the broader precinct massing and orientation. The southern and western extents of the precinct are subject to increased mid-winter overshadowing from surrounding development, resulting in reduced access to unobstructed northern and western sky compared to sites positioned along the northern and eastern edges of the precinct.

In addition, the configuration and orientation of buildings within Block 8 are significantly influenced by the adjoining park and the requirement to maintain appropriate solar access to this public open space. This necessitates a built form response that protects mid-winter sunlight to the park, which in turn limits opportunities to optimise solar orientation for residential façades within the block. Consequently, the solar performance of dwellings in Block 8 must be understood in the context of these competing design priorities, where protection of publicly accessible open space and broader precinct planning outcomes appropriately informs the distribution of solar access across the development.

Building 8CB1 is an 11-storey building located within the north-eastern quadrant of Block 8 (refer to **Figure 81**). The assessment indicates that (67.14 per cent) of dwellings achieve greater than two hours of direct sunlight, while approximately 18.9 per cent of dwellings receive no direct sunlight, which exceeds the ADG guideline that permits up to 15 per cent of apartments to receive no direct sunlight. Solar access outcomes for Building 8CB1 are constrained by a combination of its south-western precinct location and overshadowing from surrounding development. In particular, the northern façade is overshadowed by development within Block 3 to the north, while solar access from the west is also limited during the mid-winter period. These constraints are most evident at lower and mid-levels, reflecting the cumulative effects of surrounding built form and the testing of maximum building envelopes at the concept stage, rather than resolved building design.

Building 8BB1 is a 6 storey building located within the north-western quadrant of Block 8. A total of 48 of 74 dwellings (64.9 per cent) achieve a minimum of two hours of direct sunlight, which is below the 70 per cent ADG design criteria. Reduced solar access within Building 8BB1 is primarily experienced at lower levels, where the building is overshadowed by Building 2DB1 to the east. Solar access along the northern frontage is constrained as a result of the block’s south-western location within the precinct and the cumulative height and proximity of surrounding development. Apartments with eastern and western aspects generally achieve the minimum two-hour solar access requirement, benefiting from increased exposure during the mid-winter period.



**Figure 81** Extract of Block 8 solar access

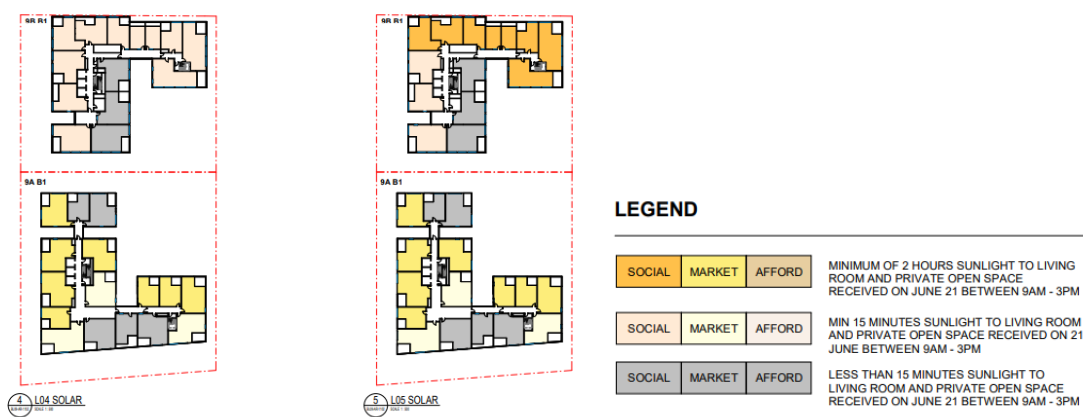
Source: SJB

Overall, the solar access outcomes for Block 8 reflect site-specific locational constraints and cumulative overshadowing associated with the south-western portion of the precinct under the concept SSDA. Opportunities to improve solar access would be explored through further refinement of building form, articulation, separation distances and apartment layouts at subsequent detailed design stages.

### Block 9 – Building 9BB1

Building 9BB1 is an 11 storey building which fronts John Street to the north. Building 9BB1 achieves 64.37 per cent solar access which is below the targeted minimum 70 per cent (refer to **Figure 82**). This is largely attributed to the L-shaped built form which located some dwellings as facing into an internal courtyard, as well as the lower levels of the northern frontage which are overshadowed by buildings to the north. The configuration of buildings within Block 9 maximises activation of the through-site link and delivers an additional area of open space, enhancing the amenity of both the block and the wider precinct.

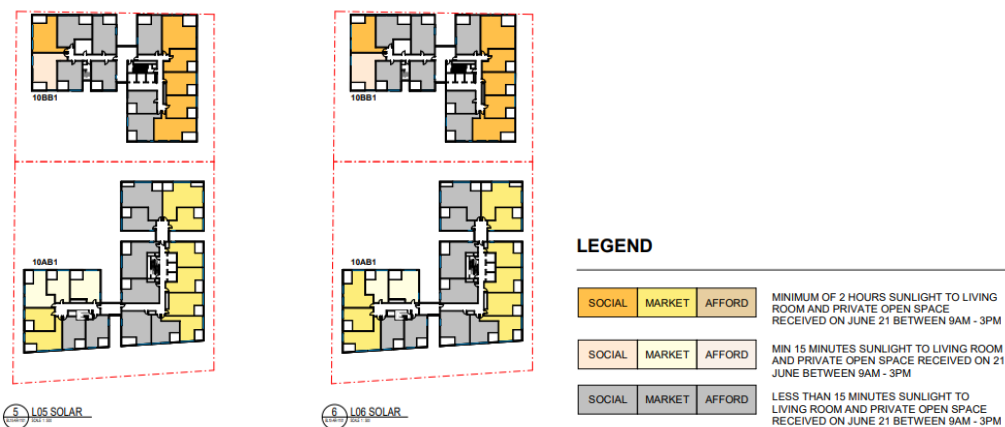
The L-shaped design also supports safety outcomes by enabling effective casual surveillance of the public domain, including all street frontages, the internal courtyard, and the through-site link. These apartments do not receive solar access due to their southern aspect, however achieve amenity through other means such as access to communal open space and through the provision appropriate natural cross ventilation.



**Figure 82** Extracts of Block 9 solar access  
Source: SJB

### Block 10 – Building 10BB1

Similarly to building 9BB1, building 10BB1 is also restricted in terms of its solar access at the lower levels, primarily due to the double loaded design which situates several apartments on the southern aspect of the building (refer to **Figure 83**). Apartments with northern frontages are overshadowed at lower levels by development to the north. Building 10BB1 is a similar scale to Building 9BB1 and comprises social housing. 63.5 per cent of the apartments within this building achieve 70 per cent solar access. Similarly to building 9BB1, the units which do not achieve the required solar access do achieve natural cross ventilation and have an outlook to communal open space to improve amenity.



**Figure 83** Extracts of solar access Block 10 solar access  
Source: SJB

### 9.5.3 Natural Cross Ventilation

Design Criteria 4B-3 of the ADG requires that at least 60 per cent of apartments are naturally cross ventilated in the first nine storeys of the building. The indicative drawings show that natural cross ventilation can largely be achieved across each block within the site. The percentage of dwellings illustrated within the reference scheme across each of the blocks that can achieve natural cross ventilation within the first nine storeys of the building are summarised as follows:

**Table 30** Natural cross ventilation achieved across first nine levels of reference scheme

Block	Tenure	Cross Vent	% Apartments achieving cross ventilation
<b>Block 2</b>	Social housing	With vent: 57 Without vent: 37	57/94 = 60.6%
	<b>Block 2 total = 60.6%</b>		
<b>Block 3</b>	Affordable housing	With vent: 134 Without vent: 84	134/218 = 61.5%
	<b>Block 3 total = 61.5%</b>		
<b>Block 4</b>	Social housing	With vent: 99 Without vent: nil	99/99 = 100%
	Market housing	With vent: 52 Without vent: 54	52/106 = 58.5%
<b>Block 4 total: 151/205 = 73.66%</b>			
<b>Block 5</b>	Social housing	With vent: 33 Without vent: 1	33/34 = 97.12%
	Market housing	With vent: 58 Without vent: 45	58/103 = 56.31%
<b>Block 5 total: 91/137 = 66%</b>			
<b>Block 6</b>	Social housing	With vent: 89 Without vent: 44	89/133 = 66.9%
	<b>Block 6 total = 66.9%</b>		
<b>Block 7</b>	Affordable housing	With vent: 74 Without vent: 46	74/120 = 62%
	Market housing	With vent: 52 Without vent: 29	52/81 = 64%
<b>Block 7 total: 126/ 201 = 62.69%</b>			
<b>Block 8</b>	Social housing	With vent: 107 Without vent: 70	107/177 = 60.5%
	Affordable housing	With vent: 46 Without vent: 28	46/74 = 62.2%
	Market housing	With vent: 52 Without vent: 34	52/86 = 60.5%
<b>Block 8 total: 205/337 = 60.83%</b>			
<b>Block 9</b>	Social housing	With vent: 64 Without vent: 41	64/ 105 = 61%
	Market housing	With vent: 69 Without vent: 42	69/111 = 62.2%
<b>Block 9 total: 133/216 = 61.56%</b>			

Block	Tenure	Cross Vent	% Apartments achieving cross ventilation
Block 10	Social housing	With vent: 59 Without vent: 39	59/98 = 60.2%
	Market housing	With vent: 76 Without vent: 46	76/122 = 62.3%
			<b>Block 10 total:</b> 135/220 = 61.34%
			<b>Waterloo South total:</b> 1,121 /1,761 = 63.66%

As outlined above, each of the blocks can achieve a minimum of 60 per cent of apartments within the first nine storeys that benefit from natural cross ventilation in accordance with the design criteria of the ADG. Further, with the minor exception of the market housing proposed on Blocks 4 and 5, each of the residential tenures have an equitable ability to achieve natural cross ventilation across the precinct.

### 9.5.4 Communal Open Space

The concept SSDA establishes the distribution of communal open spaces across the site, with the reference scheme quantifying the ability to achieve appropriate amenity. Communal open space has been distributed across the ground floor, podiums and rooftops of buildings to ensure a diversity and quantity of spaces appropriate to support the community and equating to the provision of 25% of the site area as private communal open space.

The proposed building envelopes allow for a more regular approach to communal open space than what was originally perceived under the 2022 Design Guide, enabling these spaces to achieve high quality solar access and wind comfort levels.

## 9.6 Landscaping and Public Domain

### 9.6.1 Landscaping

A Landscape and Public Domain Report has been prepared by Aspect Studios and are attached at **Appendix J**. The landscaping approach for the Waterloo South redevelopment seeks to transform the public domain into a vibrant, inclusive, and sustainable space that fosters community well-being while respecting the cultural heritage and natural environment of the area. The landscape design is integral to creating a strong sense of place, supporting biodiversity, and enhancing the ecological resilience of the precinct. This assessment outlines the key landscape features, design principles, and strategies that have been incorporated into the proposed development.

#### Landscape Design Vision and Principles

The landscape design for Waterloo South is informed by several key guiding principles:

- **Embed Country:** Drawing inspiration from the rich Aboriginal cultural heritage of the area, the design celebrates Aboriginal identity and acknowledges the deep connection to the land, water, and the stories of Country.
- **Create Green, Healthy Spaces:** The design integrates green infrastructure, such as tree canopies and water-sensitive urban design (WSUD), to improve the microclimate, mitigate urban heat, and support biodiversity.
- **Community-Centered Design:** The public domain is designed to foster social interaction, inclusivity, and accessibility, with spaces for gathering, creative expression, and community engagement.
- **Sustainability and Resilience:** Sustainable landscape practices are embedded throughout the design, from water management and planting choices to the integration of resilient, low-maintenance plant species that support both the local ecosystem and human activity.

#### Site Context and Existing Conditions

The site is characterised by relatively flat terrain in the west, transitioning into a hillside toward the east, with a high level of existing tree canopy and green space assets. The precinct includes significant mature trees, especially along internal streets, and existing public green spaces like Waterloo Park, which provide valuable ecological and recreational benefits.

The current public domain is fragmented, with underutilised spaces that lack clear definition and activation. The redevelopment presents an opportunity to enhance the landscape by improving permeability, providing diverse green spaces, and better integrating the site with its urban context.

## Landscape and Public Domain Design Features

The proposed landscape strategy for Waterloo South includes several key elements aimed at transforming the public realm into an integrated and connected network of open spaces:

- **Canopy Tree Planting:**
  - The development will retain and enhance the existing tree canopy along key streets and open spaces. The proposal aims to improve on the original 2022 Design Guides targets of 50% Medium and High value tree retention whilst also maintaining a significant number of low value trees where appropriate. The concept SSDA seeks to retain 51.6% of high value trees and 51.4% moderate value trees which exceeds the design guide target.
  - New planting will focus on native and adaptive species to provide ecological benefits, improve the microclimate, and contribute to the overall environmental sustainability of the precinct by offering shade and cooling.
  - Tree canopy planting is supported through the provision of deep soil zones across the site. The building envelopes proposed under the concept SSDA result in a 12 per cent increase in the provision of deep soil zones across the precinct compared to the original 2022 Design Guide scheme. This increase ensures that trees have sufficient space to grow, which is crucial for long-term ecological health and resilience.
- **Green Corridors and Pocket Parks:** The design includes green corridors, which will act as ecological links throughout the site, connecting Waterloo South with surrounding neighbourhoods. Pocket parks and communal courtyards will be strategically located within the precinct to offer accessible green space at the community level. The concept SSDA provides 3.2 per cent more public open space than was originally conceived under the 2022 Design Guide.
- **Water-Sensitive Urban Design (WSUD):** The landscape strategy incorporates WSUD principles, such as rain gardens, swales, and permeable surfaces, to manage stormwater, reduce the urban heat island effect, and enhance water quality. These features will be integrated with the streets and public spaces, contributing to a more sustainable and resilient environment.
- **Biodiversity and Ecological Resilience:** The landscaping plan aims to support local biodiversity through plantings that encourage native flora and fauna. Indigenous plant species will be used to create habitat for wildlife, enhance ecological corridors, and promote pollinator activity.
- **Accessibility:** The existing site conditions, as described earlier in this section include a fragmented public domain and increase in level as you move from west to east across the site. In response, the landscape strategy enforces pedestrian priority and has considered equitable access across the public domain.

The landscape design is fully integrated with the public domain, ensuring seamless connectivity between streets, parks, and open spaces. Key aspects of this integration include:

- **Village Green:** A major new community park will be developed at the heart of the site, offering a flexible space for recreational activities, community gatherings, and cultural events. The design of the park will be led by the City of Sydney through the process set out in the VPA.
- **George Street as a Civic Spine:** The redevelopment of George Street will be a key feature, transforming it into a vibrant, pedestrian-focused space. The street will integrate green planting, water features, and active street frontages to create an inviting public space that serves as the central axis for the precinct.
- **Cultural and Creative Spaces:** The design includes spaces for cultural expression and creative programming, such as arts and community events, which will be incorporated into public spaces like George Street and the Community and Creatives Neighbourhood. The landscaping also acknowledges Aboriginal heritage through the incorporation of cultural markers and design elements reflecting local histories and traditions.

### 9.6.2 Crime Prevention Through Environmental Design

Urbis have prepared a Crime Prevention Through Environmental Design (CPTED) Report to support the redevelopment of Waterloo South, which is attached as **Appendix K**. The purpose of this assessment is to evaluate how the proposed concept development integrates CPTED principles to reduce opportunities for crime, improve perceptions of safety and support community wellbeing within the precinct and surrounding area.

#### Methodology

The CPTED assessment has been undertaken in accordance with the NSW Government's Crime Prevention and the Assessment of Development Applications Guidelines and relevant City of Sydney policies. The methodology included:

- Review of existing site conditions and surrounding context, including site inspections.
- Analysis of local crime data sourced from Bureau of Crime Statistics & Research (BOCSAR) to understand prevailing crime types and trends.
- Review of the concept proposal, public domain framework and indicative built form against the four CPTED principles: surveillance, access control, territorial reinforcement, and space and activity management.
- Consultation with key stakeholders, including Homes NSW, City of Sydney representatives, community groups and NSW Police.

The assessment has been prepared at a concept level, with detailed CPTED resolution to occur at future detailed application stages.

### **Existing Environment**

The existing Waterloo South estate is characterised by ageing residential buildings, limited activation, ambiguous public-private interfaces and multiple uncontrolled access points. While some areas benefit from passive surveillance along major streets, large portions of the internal estate experience low levels of activation and limited visibility.

Crime data indicates that Waterloo experiences higher-than-average rates of certain offence types, including property damage, break and enter and antisocial behaviour. Community consultation and site observations identify perceptions of reduced safety, particularly at night, compounded by poor lighting, building deterioration, graffiti and unmanaged open spaces.

This existing condition forms the baseline against which the CPTED impacts of the proposed development have been assessed.

### **Assessment**

The proposed concept development is assessed as delivering a positive CPTED outcome when compared to the existing environment. Key outcomes include:

- Improved passive surveillance through increased residential overlooking, active ground floor uses and improved building orientation to streets, parks and pedestrian links.
- Increased activation of the public domain through new parks, community facilities, retail uses and an interconnected pedestrian network, supporting legitimate use throughout the day and evening.
- Clearer access control and territorial definition through legible building entries, consolidated access points and improved delineation between public, communal and private spaces.
- Enhanced safety outcomes for vulnerable users through accessible design, improved sightlines and increased activity in areas previously characterised by low surveillance.

While the introduction of new public spaces may attract increased activity, this is considered a positive outcome that supports natural surveillance and improved perceptions of safety when supported by appropriate design and management.

### **Mitigation Measures**

Potential CPTED risks associated with the concept development will be mitigated through:

- Detailed CPTED assessment and refinement at future detailed SSDA stages for individual buildings and public spaces.
- Implementation of lighting, landscaping and sightline controls to minimise concealment opportunities.
- Activation strategies and place management approaches to ensure ongoing use and supervision of public spaces.
- Construction-phase safety and access management to address temporary risks during redevelopment.

The CPTED assessment concludes that the proposed Waterloo South concept development establishes a strong framework for improved community safety and crime prevention outcomes. Compared to the existing estate, the proposal delivers enhanced surveillance, activation, access control and long-term place management. While some transitional impacts may occur during construction, these can be appropriately managed through future detailed design and management plans. Overall, the proposal is expected to result in a net positive community safety outcome for the precinct and surrounding area.

### 9.6.3 Public Art

UAP have prepared a Preliminary Public Art Plan (PPAP) as required under Section 13 of the 2022 Design Guide (refer **Appendix L**). The objectives of the PPAP are to ensure that public art is an integrated and cohesive part of the new development and to recognise the history and cultural significance of the site through interpretive public art.

The proposed public art framework forms an integral component of the public domain and placemaking strategy for Waterloo South. It seeks to embed cultural narratives, celebrate Country, reflect community identity and contribute to a safe, inclusive and legible precinct as redevelopment occurs over multiple stages.

The curatorial vision for the site is a conceptual launch pad for future artists to engage with Waterloo South. The PPAP proposes a series of public art options that serve as a guide for future commissioning. The following typologies and activation could be pursued at the site.

#### Iconic Makers of Place

- **Counter monument:** Within Waterloo Central is a permanent public artwork titled Captain Cook sundial and plaque. The siting of the Captain Cook sundial and plaque within the Waterloo and Redfern community can today be appreciated as ill-placed and tone-deaf considering the impact of the British invasion on Australia's First Peoples. As such there is an opportunity for an artist to create an iconic 'counter movement' within the pocket plaza of block 3.
- **Thresholds:** In its contemporary form, Waterloo South is defined by a site boundary framed by several roads and through site links creating a series of thresholds into and out of the precinct. However the stories of place are not confined to physical borders. This artwork typology offers opportunity for the artist to activate key precinct thresholds. This could take the form of a major artwork at the key threshold at Wellington Street and George Street or McEvoy Street and George Street, energising the site's 'high street'. Alternatively, an artist might choose to create a connected series of works that signpost a network of other thresholds across the precinct.
- **Activating the fold:** The Connecting with Country framework developed by NDI for Waterloo South identifies present day George Street as 'the Fold' in the precinct. The Fold is acknowledged as both a contemporary expression of where the songline passes through the precinct as well as the physical transition point between low lying 'wet country' to the west and steep includes of 'dry country' to the east.

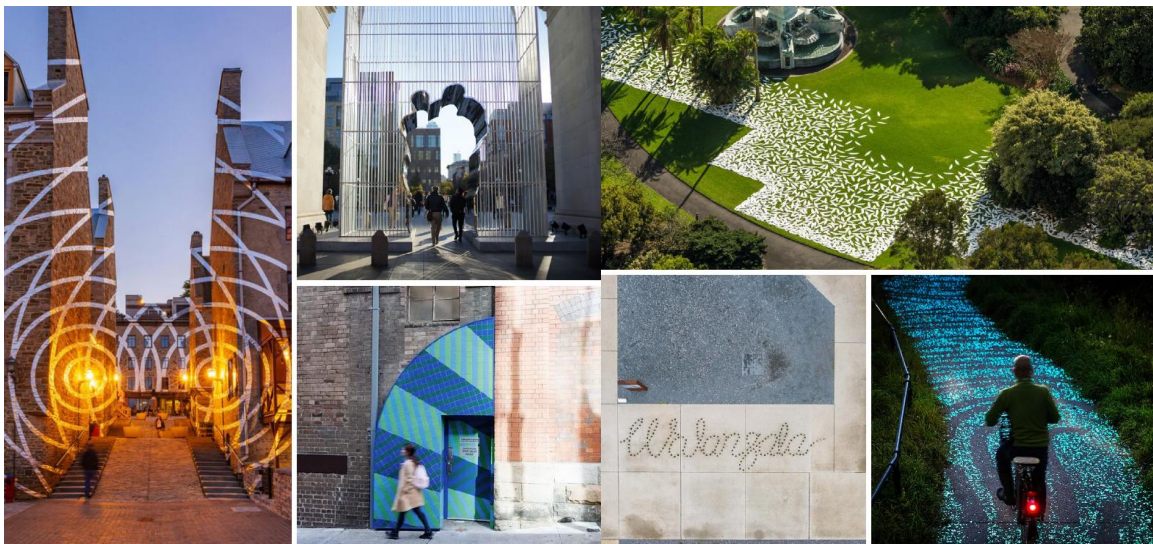


Figure 84 Public art precedent images

#### Embedded Storytelling

Embedded storytelling explores the fine-grain character of the precinct, celebrating the power of small moments coalescing into impactful site narratives. Possible form typologies include, small scale sculptures or attachments, embedded ground plane treatments, façade treatments. Locations of these artworks include:

- East-west through site links and roads
- Forecourts, gateways and lobbies
- Building facades or gateways with high public visibility
- Site wide electricity kiosks

## Artist-led Functional Elements

Functional elements within a precinct can serve many purposes, such as seating, shade, play areas or safety features. When designed by an artist, these everyday objects are transformed into creative expressions and inviting social nodes. The following could be introduced at the site within forecourts and building lobbies:

- **Social Structures:** including seating, tables or shelters that foster quieter moments of connection or foster large-scale social events or micro playscapes.
- **Lighting:** to create safe spaces while animating the precinct at night.
- **Interspecies support:** such as interventions that foster connection between people and the non-human life for a healthier, more resilient urban environment.

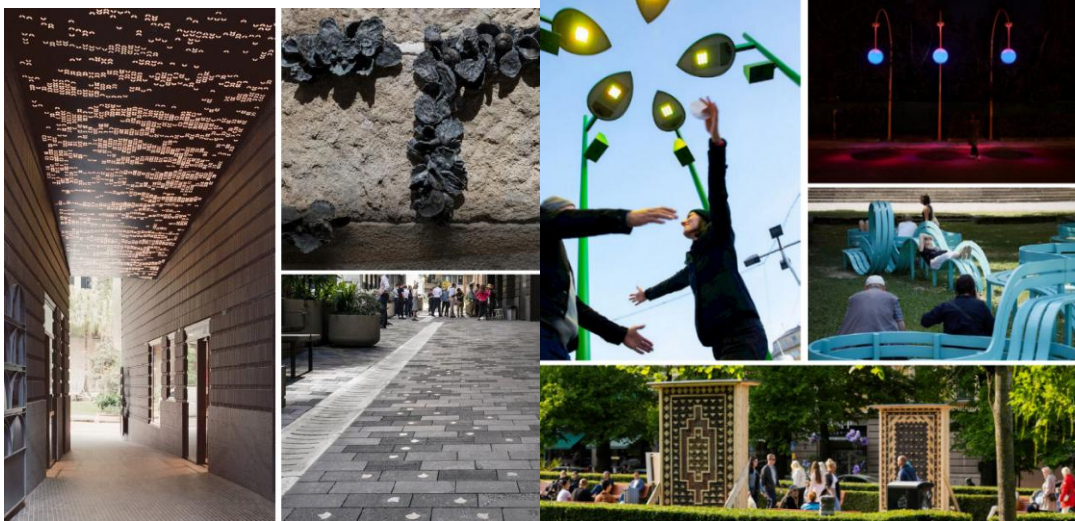


Figure 85 Public art precedent images

## Temporary Activation

During construction there is an opportunity to introduce a temporary program design to lay the foundations of home through shared moments, neighbourly connections and stories that become local lore. Possible activations include:

- Stage-based bespoke hoarding commissions
- 'Artist in Residence': an artist with a socially engaged practice is engaged for a fixed period of time to spend time on site, host workshops, connects with the community and propose temporary activations in response to community interest
- Workshops with local community groups, such as schools.

Artist engagement and procurement methods will be varied to support the creation of a public art landscape. These methods include expression of interest, direct selection, limited competition, mentorship. UAP have outlined the proposed staging of delivery of public art as well as indicative budgeting guidelines within their PPAP. Potential risks associated with public art delivery are appropriately mitigated through the following measures identified in the strategy:

- Preparation of detailed Public Art Plans at future DA stages, consistent with City of Sydney guidance and this masterplan.
- Ongoing engagement with First Nations representatives, community stakeholders and relevant authorities throughout commissioning and delivery.
- Clear governance, procurement and approval pathways to manage quality, cultural safety, maintenance and ownership responsibilities.
- Staged delivery and allowance for temporary and interim works to manage construction impacts and maintain activation during redevelopment.
- Consideration of durability, maintenance and decommissioning to ensure long-term sustainability of public art assets

The proposed PPAP represents a well-considered, policy aligned and culturally grounded framework that will contribute positively to the environmental and social outcomes of the redevelopment. By embedding public art into the public domain, recognising Country and community narratives and providing a clear pathway for future delivery, the strategy supports the creation of distinctive, inclusive and resilient precinct.

## 9.7 Contamination and Remediation

The EIS is accompanied by an Overarching Remediation Action Plan (O-RAP) (**Appendix T**) and informed by the Data Gap Investigation (DGI) (**Appendix S**) both prepared by JBS&G, to determine whether the site is suitable in its current state for the proposal from a contamination perspective.

The site is to be developed in stages over an extended period of approximately 10 to 15 years, with each stage subject to separate detailed applications. The purpose of the O-RAP is to provide a comprehensive remedial strategy to support the concept SSDA, the project's ESD and waste minimisation objectives, and to support future stage-specific works.

The O-RAP is considered the most appropriate approach for a large-scale, staged development of this nature. Stage-specific Remedial Works Plans (RWP) will be prepared for each stage, detailing the specific remediation requirements as design plans become available.

### 9.7.1 Methodology

Contamination has been assessed through a staged program of investigations undertaken to support strategic planning and redevelopment of the precinct. This includes a Preliminary Site Investigation, Detailed Site Investigation, and a recent Data Gap Investigation undertaken to address remaining uncertainties and inform remediation planning at a precinct-wide scale.

The Data Gap Investigation involved systematic soil and groundwater sampling across accessible areas of the site, laboratory analysis for a comprehensive suite of contaminants of potential concern, and the refinement of a conceptual Site Model. The investigation was undertaken in general accordance with the National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended), NSW EPA guidelines and relevant Australian Standards.

The findings of these investigations have informed the preparation of an Overarching Remedial Action Plan (O-RAP), which establishes a framework for remediation and management of contamination across the precinct, to be implemented through staged development and supported by stage-specific Remedial Works Plans.

A site auditor has been engaged by Stockland as a NSW Environment Protection Authority (EPA) Accredited Contaminated Sites Auditor. The auditor considers the Overarching RAP provides an adequate outline of remediation approaches that can be implemented at the site given the current understanding of the nature and extent of contamination.

### 9.7.2 Existing Environment

Previous investigations identified that much of the site is underlain by shallow fill material, typically less than one metre in thickness, associated with historic redevelopment and construction activities. This fill has been found to contain a range of contaminants typical of urban redevelopment sites, including heavy metals, polycyclic aromatic hydrocarbons (PAHs), total recoverable hydrocarbons (TRH) and asbestos-containing materials. Groundwater beneath the site occurs within the Botany Sands aquifer and has historically exhibited elevated concentrations of some analytes consistent with regional urban background conditions rather than site-specific sources

### 9.7.3 Assessment

The contamination assessment demonstrates that contamination is present across the site at levels typical of historical urban redevelopment areas and is largely confined to shallow fill materials. Identified contaminants include heavy metals, PAHs, hydrocarbons and asbestos, with exceedances primarily relating to ecological criteria and, in more limited instances, human health criteria under certain land use scenarios.

Groundwater impacts, including minor exceedances of metals and PFAS, were assessed as consistent with regional background conditions within the Botany Sands aquifer rather than attributable to site-specific contaminating activities. The assessment indicates that groundwater contamination does not present an unacceptable risk to human health or the environment, noting that groundwater use in the area is restricted and controlled under existing regulatory frameworks.

Given the concept stage of the proposal, detailed remediation outcomes are not required to be finalised at this stage. Instead, the assessment confirms that contamination can be appropriately managed and remediated to support the proposed land uses, provided that remediation is undertaken in accordance with the O-RAP and relevant regulatory requirements. No contamination issues were identified that would preclude the proposed rezoning or redevelopment of the site.

The preferred remediation option for future works is the cap and containment of impacted fill on the site subject to leachability and groundwater considerations.

## 9.7.4 Mitigation Measures

Contamination risks will be managed through a combination of remediation, validation and ongoing management measures, including:

- Implementation of the O-RAP to guide remediation across the precinct
- Preparation and approval of stage-specific Remedial Works Plans prior to redevelopment of individual stages
- Removal, treatment or containment of contaminated fill material to achieve suitability for proposed land uses
- Management of asbestos-containing materials in accordance with NSW EPA and SafeWork NSW requirements
- Validation of remediated areas through independent environmental assessment
- Implementation of construction environmental management measures to control dust, runoff and worker exposure

These measures will ensure that contamination is addressed in a manner consistent with regulatory standards and suitable for the intended residential, open space and mixed-use outcomes.

## 9.7.5 Conclusion

The contamination assessment concludes that, while contamination is present across the Waterloo South site, it is typical of inner-city redevelopment areas and can be effectively managed through established remediation and planning controls. The investigations undertaken to date provide sufficient understanding of site conditions to support the concept proposal.

Subject to the implementation of the O-RAP and stage-specific remediation measures, the site can be made suitable for its proposed future uses without unacceptable risk to human health or the environment. Accordingly, the concept proposal is considered acceptable from a contamination perspective and consistent with relevant State environmental planning and contamination management requirements.

# 9.8 Biodiversity and Tree Removal

## 9.8.1 Tree Removal

This section assesses the potential arboricultural impacts associated with the proposed Waterloo South redevelopment. The assessment has been informed by the Arboricultural Impact Assessment (**Appendix Q**) prepared by Tree Management Strategies Pty. The purpose of this assessment is to identify the extent of tree removal and retention required to facilitate the concept development, evaluate the nature of impacts to retained trees, and outline the framework for tree protection and further investigation at subsequent detailed SSDA stages.

### Methodology

The Arboricultural Impact Assessment was undertaken in accordance with relevant Australian Standards, including *AS 4970–2025 Protection of Trees on Development Sites*, and the *IACA Significance of a Tree Assessment Rating System (STARS)*. The methodology included:

- Detailed site inspections undertaken in November 2024.
- Assessment of 540 trees with respect to species, size, health, condition, landscape significance and retention value.
- Classification of impacts arising from proposed building envelopes, roads, services and construction-related activities (including scaffolding and hoarding).
- Identification of trees suitable for retention, removal or further investigation.
- Development of concept-level tree protection and sensitive construction measures.

The assessment has been prepared at a concept level and will be supplemented by detailed Arboricultural Impact Assessments for each future detailed application as required.

### Existing Environment

The Waterloo South site contains a substantial and varied tree population comprising mature native and exotic species distributed across streets, open spaces and residential areas. The existing tree stock includes trees of high, medium and low retention value, reflecting differences in age, condition, useful life expectancy and landscape significance.

Many trees contribute positively to local amenity, canopy cover and urban character. However, some trees exhibit reduced health or form due to past pruning, infrastructure constraints and site conditions. This existing arboricultural context forms the baseline against which the impacts of the proposed concept development have been assessed.

### Assessment

The Arboricultural Impact Assessment identifies that the proposed concept development will result in both tree removal and retention outcomes.

Of the 540 trees assessed:

- 236 trees are proposed for removal, primarily due to major or total incursions into their Structural Root Zones (SRZs) or Notional Root Zones (NRZs) associated with building envelopes, roads and essential infrastructure.
- 304 trees are nominated for retention and protection.

This equates to the retention of 50.97 per cent of high retention value trees, 51.4 per cent of moderate retention value trees and 62.4 per cent of low value trees which complies with the minimum requirement for the retention of 50 per cent high value and medium retention value trees as per the requirements of the 2022 Design Guide.

### Mitigation Measures

Potential impacts to existing trees will be mitigated through:

- Implementation of the Tree Protection Specifications outlined in the Arboricultural Impact Assessment, including tree protection fencing, trunk protection, ground protection, mulching and irrigation.
- Use of sensitive construction techniques, such as under-boring and vacuum excavation, to minimise root disturbance where services are installed within Tree Protection Zones.
- Project arborist supervision for works within or adjacent to NRZs and SRZs.
- Root mapping investigations to inform final retention or removal decisions for trees subject to major incursions.
- Preparation of Arboricultural Impact Assessments and protection plans for each future detailed application stage.

The concept proposal establishes a robust framework for managing arboricultural impacts through sensitive design, construction controls and staged investigation. With the implementation of recommended protection measures and further detailed assessment at subsequent SSDA stages, the proposal is considered capable of achieving acceptable arboricultural outcomes while supporting the broader urban renewal objectives of the Waterloo South precinct.

### 9.8.2 Biodiversity

A Biodiversity Development Assessment Report (BDAR) waiver request (refer to **Appendix R**) was prepared by Narla Environmental and was submitted to the Department. The BDAR outlines that the proposal will not adversely impact biodiversity as outlined in the preceding sections, and as such a BDAR waiver was requested from the Department on 22 December 2025 and granted on 10 February 2026.

### Methodology

Targeted ecological surveys were undertaken to assess the potential presence of threatened fauna species, with a particular focus on microchiropteran bats due to the presence of man-made structures proposed for removal. Modified survey techniques, were implemented including daytime inspections and dusk monitoring using ultrasonic detectors and thermal imaging. These surveys did not identify any roosting microbat activity or evidence of occupation within the buildings assessed. As a precautionary measure, the report recommends that a pre-clearance survey be undertaken prior to any future demolition works to confirm the absence of roosting individuals at that time.

### Existing environment

The site is located within a highly urbanised environment and is currently occupied by existing residential buildings, roads, hardstand areas, landscaped garden beds and street trees typical of an inner-city setting. Ecological investigations confirm that vegetation within the site comprises predominantly mixed urban landscape and planted native vegetation, with no native vegetation communities or threatened ecological communities identified. The vegetation present is largely exotic-dominated or landscaped in nature and does not meet the criteria for assignment to a Plant Community Type (PCT) under the Biodiversity Assessment Method (BAM).

## Assessment

The assessment concludes that the proposed concept SSDA is unlikely to result in significant impacts on biodiversity values as defined under the *Biodiversity Conservation Act 2016* and the *Biodiversity Conservation Regulation 2017*. The site does not contribute to habitat connectivity, threatened species movement or flight path integrity due to its isolation within an established urban matrix. Similarly, the proposal is not expected to affect water-dependent biodiversity values or hydrological processes supporting threatened species.

Importantly, the concept SSDA does not seek approval for specific tree removal or detailed construction works. While future detailed SSDAs will require the removal of trees within building envelopes, these impacts will be assessed at that stage with appropriate mitigation measures identified. The BDAR Waiver Request notes that future landscaping should prioritise the retention of larger native canopy trees where feasible and incorporate locally native species to enhance biodiversity outcomes over time.

## Conclusion

On the basis of the existing site conditions, the findings of detailed ecological investigations and the strategic nature of the concept SSDA, it is considered that the proposal is not likely to have a significant impact on biodiversity values. This conclusion was quantified through the granting of a BDAR Waiver.

## 9.9 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) and an Archaeological Technical Report have been undertaken by Artefact for the proposed development (refer to **Appendix W** and **Appendix Y**). These reports provide an assessment of the potential impacts of the proposed development on archaeological, Aboriginal archaeological and cultural heritage values and items within and surrounding the site and provides recommendations for the management and mitigation of these potential impacts.

### 9.9.1 Methodology

The ACHAR was prepared in accordance with SEARs, the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW, the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW, and the Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010).

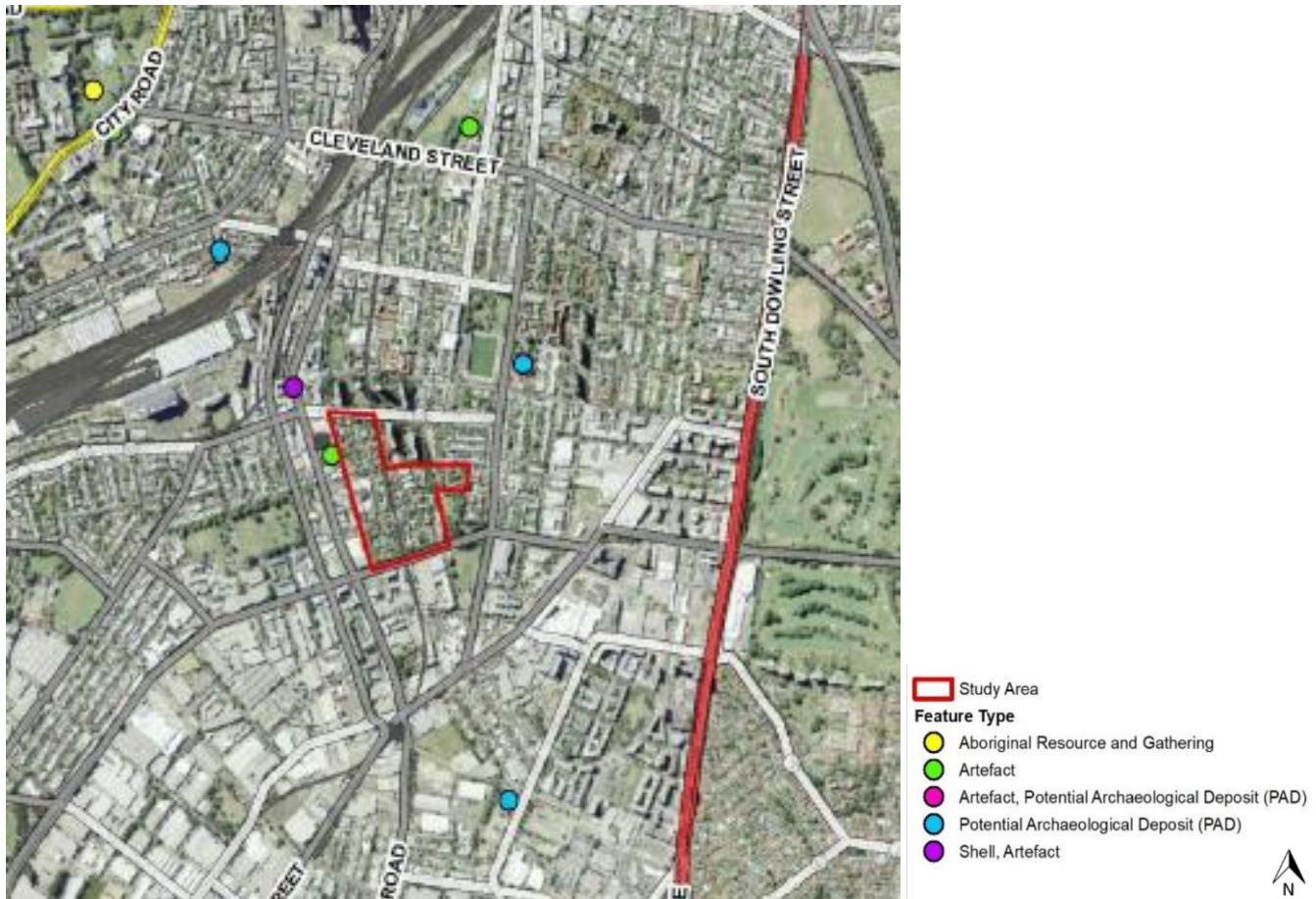
The assessment methodology included a review of historical, archaeological and environmental background information, an AHIMS search and the development of a predictive archaeological model. Archaeological field surveys and test excavation investigations are proposed to occur post-demolition.

Expressions of interest have been sent out to the Registered Aboriginal Parties (RAPs). Consultation will be undertaken through a staged process consistent with statutory requirements, with RAPs invited to review and provide feedback on both the assessment methodology and draft findings.

### 9.9.2 Existing Environment

The study area is located within Gadigal Country and the boundaries of the Metropolitan Local Aboriginal Land Council. While the site has experienced substantial historical disturbance associated with residential development and urban infrastructure, it remains situated within the broader cultural landscape of the Sydney region, which has been occupied by Aboriginal people for tens of thousands of years.

A review of the Aboriginal Heritage Information Management System (AHIMS) identified no registered Aboriginal sites within the study area. Two AHIMS sites are located within 200 metres of the site, both of which have either been determined not to be Aboriginal sites or have been previously destroyed through earlier works.



**Figure 86** AHIMS search area

The site is underlain by the Tuggerah Soil Landscape, with deposits of Botany Sands present at depth. Despite surface disturbance, these geological conditions indicate the potential for subsurface Aboriginal objects to be present. On this basis, a Potential Archaeological Deposit (PAD), identified as Waterloo South PAD 01 (AHIMS ID: 45-6-4171), was recorded across a substantial portion of the study area. The site also holds historical and social significance for the contemporary Aboriginal community, reflecting long-standing connections to the area and its role within the broader Eora cultural landscape.

### 9.9.3 Assessment

The assessment concluded that no known registered Aboriginal sites would be directly impacted by the concept proposal. However, the proposed development has the potential to impact subsurface Aboriginal objects within Waterloo South PAD 01 due to excavation associated with basement construction and other ground-disturbing works. The PAD is depicted in blue as depicted in **Figure 87**.

The south western corner of block 2 also contains a concentration of fragmented shells, as depicted in **Figure 87**. Further investigation is needed to confirm whether these fragments represent disturbed middens or organic material within fill.

Given the concept nature of the proposal and the presence of existing buildings, occupied tenancies and extensive hardstand, complete archaeological testing of the PAD prior to approval is not considered feasible. As such, the assessment identifies that harm to potential archaeological resources may occur if the PAD cannot be avoided, and that further investigation is required to confirm the presence, nature and significance of any subsurface Aboriginal objects.

The assessment also considered Aboriginal cultural heritage values beyond physical objects, including historical, social and associative values. While the proposal would alter the existing built environment, it does not remove or isolate the area from its broader cultural landscape, provided appropriate mitigation and ongoing consultation are implemented.



**Figure 87** Location of PAD and shell fragments

Source: ACHAR prepared by Artefact

### 9.9.4 Mitigation Measures

The primary mitigation measure is avoidance of impacts to the PAD where feasible through detailed design refinement at subsequent stages. Where avoidance is not possible, the ACHAR recommends a staged archaeological test excavation program to be undertaken by a suitably qualified archaeologist in consultation with RAPs. This excavation would be designed to verify the presence of Aboriginal objects, assess significance, and inform appropriate management outcomes.

Due to site constraints, the preferred approach is for archaeological test excavation to occur post-demolition but prior to major ground-disturbing works, supported by an Excavation Methodology approved by Heritage NSW. The results of this investigation will be documented in an amended ACHAR prepared in consultation with the Aboriginal community and submitted to the relevant authorities

Additional mitigation measures include ongoing consultation with RAPs throughout detailed design and construction, assessment of any design changes for potential heritage impacts, and implementation of appropriate heritage management protocols should Aboriginal objects be identified during works.

### 9.9.5 Conclusion

The ACHAR concludes that while the study area has been heavily modified there remains potential for subsurface Aboriginal archaeological material within identified areas of PAD. The concept proposal may result in impacts to these potential resources; however, these impacts can be appropriately managed through staged investigation, consultation and mitigation in accordance with statutory requirements and best-practice heritage management principles.

Subject to implementation of the recommended mitigation measures and ongoing Aboriginal stakeholder engagement, the proposal is considered capable of proceeding without unacceptable impacts on Aboriginal cultural heritage values.

## 9.10 Environmental Heritage

A Statement of Heritage Impact (SOHI) and Historical Archaeological Assessment have been prepared by Artefact (**Appendix X** and **Appendix V**) to support the concept SSDA and assesses the potential impacts of the Waterloo South redevelopment on non-Aboriginal heritage values. The assessments consider the locally listed heritage items located within the site, a State heritage-listed item located deep beneath the site, and the site's relationship with surrounding heritage conservation areas.

### 9.10.1 Methodology

The historical archaeological assessment comprises a physical inspection of the study area. The study area was divided into Survey units 1 to 5 due to its large size. Overall visibility of exposed ground surfaces was low throughout the study area due to concrete and paved surfaces, grass coverage and the extant social housing infrastructure.

The non-Aboriginal heritage assessment was undertaken in accordance with the NSW Heritage Manual, the Burra Charter, and relevant NSW and local planning controls. The methodology included:

- Identification of heritage items and heritage conservation areas within and adjoining the site;
- Review of historical documentation, mapping and previous heritage studies;
- Assessment of heritage significance and sensitivity;
- Evaluation of potential direct and indirect impacts arising from the concept proposal.

The assessment has been undertaken at a concept level, recognising that detailed design will be resolved through future development applications.

### 9.10.2 Existing environment

The archaeological assessment study area comprises 5 survey units which transition from generally flat landforms in the west and centre to increasingly steep and modified terrain toward the east. The survey units are described as:

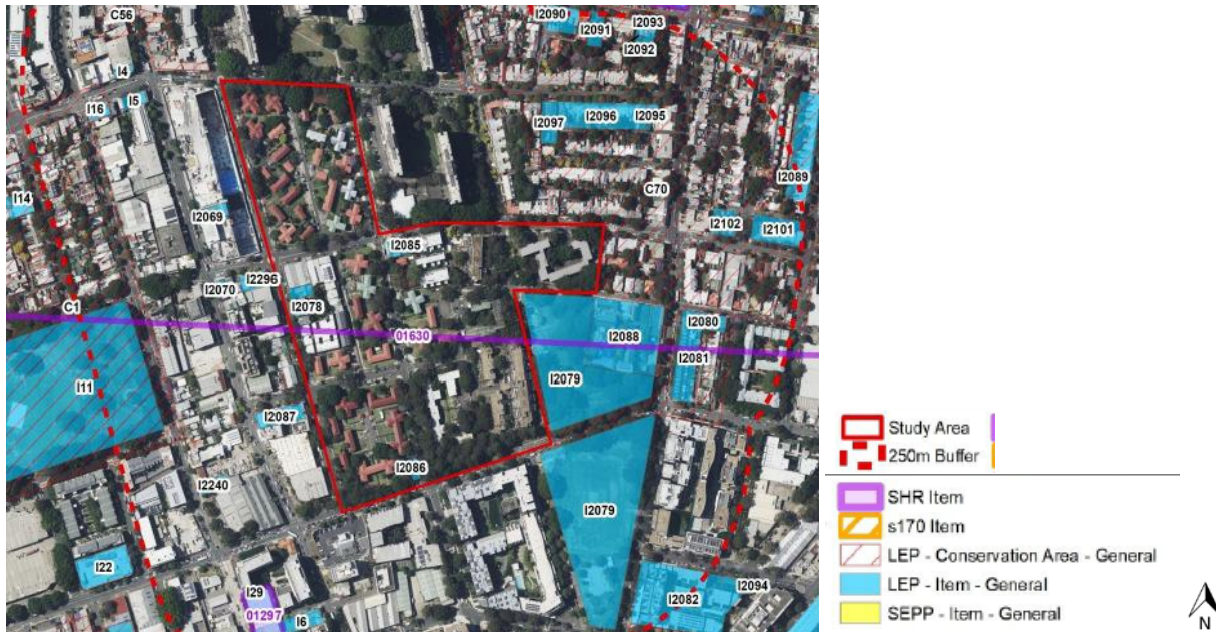
- Survey Units 1–3 are characterised by flat topography containing social housing buildings, paved areas, landscaping and underground services, with ground surfaces largely covered by concrete, bitumen and grass and only limited exposed soil. Evidence of localised disturbance from construction, servicing and landscaping is present. Survey Unit 3 also contains an electricity substation (LEP Item I2086) within comparatively larger garden and grassed areas
- Survey Unit 4 extends from George Street to Pitt Street, with a flat western portion similar in character to Survey Units 1–3, including residential development, services, landscaping and basement construction, and the Duke of Wellington Hotel (LEP Item I2085). The landform rises eastward, where terrain shows cutting, grading and terracing associated with roads, pathways and residential development.
- Survey Unit 5 occupies the steepest part of the site, where land continues to ascend toward a south-eastern crest and has been extensively reshaped through cutting, grading and terracing.

The existing heritage environment comprises a State heritage-listed item, being the Sydney Water sewer infrastructure, runs beneath the site. This underground infrastructure is listed on the NSW State Heritage Register and is of State significance for its historic, technical and engineering values, reflecting the development of Sydney's water and sewerage systems. The sewer infrastructure does not have a visible presence at ground level; however, it is a critical heritage asset that must be considered in relation to excavation, basement construction and subsurface works proposed as part of the redevelopment.

The site also contains the following locally listed heritage items:

- Duke of Wellington Hotel including Interior (SLEP no. I2085) (Local)
- Former Waterloo Pre-school (225 Cope Street) including interior (SLEP no I2077) (Local)
- 2-storey Victorian terrace houses (circa 1880) (SLEP no I2078) (Local)
- Single-storey interwar building, Electricity Substation (circa 1880) (SLEP no. I20786 (Local)

These items are associated with the historical development of the Waterloo social housing estate and reflect post-war approaches to social housing, urban planning and community provision. These heritage items contribute to local heritage significance through their association with the history of public housing and social welfare in NSW, their role in shaping the built form and identity of Waterloo and their social value to former and current residents and the broader community.



**Figure 88** Heritage items within 250m of the site

Source: *Statement of Heritage Impact prepared by Artefact*

While the concept proposal does not seek detailed approval for demolition or alteration of specific heritage items, the redevelopment of the site has the potential to directly and indirectly affect these locally listed items. The site is located adjacent to, and in proximity to, the following Heritage Conservation Areas (HCAs):

- Redfern Estate Heritage Conservation Area to the north
- Waterloo Heritage Conservation Area to the east

These HCAs comprise historic residential development and contribute to the broader heritage character of the area. The site forms part of the visual and urban context for these conservation areas.

### 9.10.3 Assessment of Impacts

The concept SSDA establishes maximum building envelopes, building heights and indicative land use distribution across the Waterloo South site. While it does not seek approval for the demolition or alteration of specific heritage items, the potential physical and visual impacts associated with future development have been considered at a strategic, precinct-wide level, having regard to the location, scale and intensity of proposed built form.

#### Historical Archaeology

The development proposal would result in a substantial impact to ground surfaces throughout the study area. The study area has been assessed as having areas of low and high potential to contain archaeological resources associated with Phases 2-3, spanning 1920's- 1960's. Such archaeological resources may be of state significance, depending on the intactness or nature of the item. Potential significant archaeological works do not typically trigger a requirement to obtain an excavation permit but do require an Archaeological Research Design and Excavation Methodology (ARDEM). 'Relics' typically trigger a requirement to obtain an excavation permit or exception under Section 140 of the Heritage Act

#### State-significant Pressure Tunnel and Shafts

The concept SSDA proposes development in proximity to the State-significant Pressure Tunnel and Shafts during Stages 2-5 (Blocks 2, 3, 4 and 6). The tunnel and shafts are located approximately 30 metres below ground level. The SOHI confirms that ground-disturbing activities for investigation and construction of development blocks 2, 3, 4 and 6 are unlikely to physically impact the Pressure Tunnel and Shafts as these are located at RL-34.278, and the lowest basement RL is above RL 0. The concept envelopes are unlikely to facilitate future development that will physically impact the pressure tunnels, due to the degree of separation from the lowest basement extent and the tunnels. Further no visual impacts to the tunnels will occur, given they are situated underground.

## Locally significant heritage items

The concept SSDA proposes development in the vicinity of several locally significant heritage items, including the Duke of Wellington Hotel, Former Waterloo Pre-School, 2-storey Victorian terrace houses on Cope Street, and Electricity Substation No. 174. No direct works are proposed to these heritage items and, as such, no direct physical impacts to their significant fabric are anticipated.

Across the site, demolition and excavation works associated with future development have the potential to result in minor indirect impacts, including vibration and settlement, which would be managed through detailed design, construction methodologies and appropriate mitigation measures.

The primary heritage impacts associated with the concept SSDA relate to changes to setting and visual context, arising from the scale, height and cumulative intensity of redevelopment across the precinct, as follows:

- **Duke of Wellington Hotel:** No physical works are proposed to the Duke of Wellington Hotel. Development in the vicinity of the Duke of Wellington Hotel would alter its immediate setting, and demolition and excavation could damage the Hotel through vibration, which will be further assessed at detailed application stage. The overall scale of the redevelopment will result in moderate visual impacts to the heritage item. To mitigate visual impacts the concept design includes stepped building forms and setbacks to minimise bulk and overshadowing, of the heritage item.
- **Former Waterloo Pre-school:** Development near the Former Waterloo Pre-School, including a 4-storey building to the east, would be generally consistent with the existing low-rise context and partially screened by vegetation. There are no physical works proposed to the former school, as such not physical impacts are expected. There may be minor impacts associated with vibration which will be further investigated at detailed design stage. The broader precinct redevelopment would result in minor adverse visual impacts due to the substantial alteration and the setting of the heritage item.
- **Victorian Terrace Houses:** Development in the vicinity of the 2-storey Victorian terrace houses on Cope Street would occur during Stage 2 (Block 2). The concept SSDA includes the retention of the terrace houses for a mixed use purpose. A new 2-storey building is proposed to the east. While no physical impacts are proposed or approved at the concept stage, future adaptation of the buildings for new uses may have the potential to impact heritage fabric, subject to the scope of works and detailed design, which would be addressed through future detailed applications. The proposed 2-storey building is consistent with the surrounding low-rise context and would not, in isolation, result in significant visual impacts; however, the broader precinct redevelopment would result in minor adverse visual impacts.
- **Electricity Substation:** Development surrounding Electricity Substation No. 174, including mid-rise buildings immediately adjacent and significantly taller development opposite George Street, would represent a substantial increase in height and bulk relative to its low-scale setting. The cumulative effect would result in a substantial alteration to the physical and visual setting of the heritage item, giving rise to major adverse visual impacts, notwithstanding the absence of physical impacts.

Overall, the concept SSDA would not result in direct physical impacts to locally significant heritage items at the concept stage. However, it would give rise to a range of minor to major adverse visual impacts, primarily attributable to cumulative changes to heritage setting arising from precinct-scale redevelopment. These impacts are largely consistent with those associated within the building envelopes contained within the 2022 Design Guide. Potential physical impacts associated with underground infrastructure, construction and future adaptive reuse would be subject to detailed design and further assessment at subsequent approval stages.

## Heritage items in the vicinity

The SOHI also describes the potential impacts of the proposal to heritage items within 250m of the study area. No physical impacts to surrounding heritage items are expected, whilst minor to major visual impacts are anticipated due to the proposed increase in scale from the existing condition.

### 9.10.4 Mitigation Measures

The mitigation measures for Historical archaeology are outlined in **Appendix C** and the Historical Archaeological Assessment at **Appendix V**.

Mitigation measures for non-Aboriginal heritage include:

- Retention and consideration of locally listed heritage items within the broader precinct planning framework
- Detailed heritage impact assessment for any future works affecting heritage items
- Design controls to manage building scale, massing and setbacks at heritage interfaces

- Vibration assessments are to be undertaken at detailed design stage
- Consultation with Sydney Water and Heritage NSW for works near the State heritage-listed sewer infrastructure
- Archaeological management procedures to address any unexpected historical remains encountered during excavation

### 9.10.5 Conclusion

The site contains locally listed heritage items, is underlain by a State heritage-listed sewer infrastructure, and is located within a heritage-sensitive urban context. The concept proposal acknowledges these heritage constraints and establishes a strategic framework that enables heritage impacts to be appropriately assessed, managed and mitigated through subsequent stages of detailed design and approval.

Subject to the implementation of recommended mitigation measures and ongoing consultation with relevant heritage authorities, the proposal is considered acceptable from a non-Aboriginal heritage perspective and capable of proceeding without unacceptable impacts on heritage significance.

## 9.11 Infrastructure Delivery and Staging

An Infrastructure Delivery and Staging Plan has been prepared by WSce for Waterloo South to demonstrate that the proposed redevelopment can be appropriately serviced and delivered in a staged manner (refer to **Appendix Z**). The plan considers the capacity, suitability and staging of essential infrastructure, as described in **Section 6.5.3** and establishes a framework for coordinated delivery aligned with the proposed development sequencing.

### 9.11.1 Methodology

The Infrastructure Delivery and Staging Plan was prepared through a review of available utility provider information, consultation with relevant authorities and service agencies, and assessment of existing infrastructure capacity and constraints. The methodology involved:

- identification of existing trunk and local infrastructure servicing the site;
- assessment of network capacity to accommodate the proposed redevelopment;
- identification of required upgrades, diversions and new infrastructure;
- development of a staged servicing strategy aligned with the proposed development stages; and
- consideration of opportunities to improve infrastructure resilience and public domain outcomes through coordinated delivery.

### 9.11.2 Existing Environment

The site is serviced by established water, wastewater, stormwater, electricity and telecommunications networks that reflect the former public housing estate layout. Much of the existing infrastructure is ageing and will require renewal or replacement as part of redevelopment. Surrounding utility networks support a dense inner-city environment and operate within acceptable capacity limits, although localised upgrades are required to accommodate the proposed development intensity.

### 9.11.3 Impact Assessment and mitigation

#### Infrastructure delivery impacts

The delivery of new and upgraded infrastructure will involve excavation, trenching, service connections and the installation of substations and drainage infrastructure. These works have the potential to result in temporary impacts including noise, vibration, dust, traffic disruption and temporary changes to pedestrian and vehicle access. Given the scale of the precinct and the staged nature of development, there is potential for cumulative construction impacts if works are not appropriately coordinated.

These impacts will be mitigated through a staged infrastructure delivery approach aligned with development sequencing, ensuring that infrastructure works are limited in extent and duration at any one time. Detailed Construction Environmental Management Plans (CEMPs) will be prepared at subsequent stages to manage construction impacts in accordance with relevant guidelines and standards.

## Servicing and network impacts

The assessment confirms that existing downstream water and wastewater networks have sufficient capacity to accommodate the proposed redevelopment, subject to localised upgrades. Infrastructure delivery will be coordinated to ensure that new services are available prior to occupation of each development stage, avoiding adverse impacts on surrounding networks or existing users.

The proposed all-electric servicing strategy avoids reliance on new gas infrastructure and reduces long-term operational impacts associated with fossil fuel use. Electrical upgrades, including new substations and feeders, will be delivered progressively to match demand and avoid overloading of the existing network. Telecommunications infrastructure will be protected or relocated as required to maintain continuity of service.

## Public domain and cumulative impacts

Staged infrastructure delivery has the potential to temporarily affect the public domain through partial road closures, footpath diversions and altered access arrangements. These impacts will be managed through careful programming, coordination with Council and service authorities, and the implementation of traffic and pedestrian management plans. The progressive undergrounding and rationalisation of services will deliver long-term public domain improvements, including safer streets, improved amenity and greater flexibility for landscaping and public space design.

### 9.11.4 Conclusion

The assessment concludes that infrastructure delivery and staging for the Waterloo South concept SSDA will not result in unacceptable environmental or amenity impacts, provided that works are appropriately staged, coordinated and managed. While temporary construction-related impacts are anticipated, these impacts can be effectively mitigated through established management measures and detailed planning at subsequent stages. In the long term, the proposed infrastructure delivery strategy will result in improved service reliability, enhanced public domain outcomes and a more resilient and sustainable precinct.

## 9.12 Water Management

As discussed in **Section 6.5.5**, a site wide Stormwater Management Strategy has been prepared by WSce (**Appendix U**) to support the staged development of Waterloo South. The early investigation of site wide stormwater management systems will ensure that the land is suitable for its intended use prior to works commencing and that adjacent areas are protected.

### 9.12.1 Existing Environment

The Waterloo South Precinct Area currently experiences stormwater runoff from various impervious surfaces, including buildings, roads, and paved areas, which are drained through a combination of in-ground stormwater infrastructure and overland flow. The existing system comprises a series of reinforced concrete, vitrified clay, and polyvinyl chloride (PVC) pipes, varying in diameter from 225 mm to 1050 mm, and several box culverts. The drainage system has been observed to exhibit capacity limitations, with some areas experiencing surcharge during high-intensity rainfall events.

The site generally slopes from east to west, contributing to the existing stormwater flow towards the Alexandra Canal via the Sydney Water trunk drainage system and the site is subject to overland flow flooding, particularly along the southern and western boundaries. This has been confirmed within the Flood Report prepared by GRC Hydro, as discussed in **Section 9.13**.

The current stormwater system consists of kerb inlet pits, surface inlet pits, and manholes, all of which direct runoff to low points on Cope Street and McEvoy Street. The system's capacity has been compromised in certain areas due to reduced pipe sizes, inadequate grades, and aging infrastructure. Notable areas for improvement include:

- **Cope Street:** A reduction in pipe diameter is observed downstream, potentially leading to bottlenecks.
- **Wellington and Pitt Streets:** Instances where the stormwater line transitions to smaller pipe diameters, impacting flow capacity.

A detailed investigation and CCTV inspection of the existing network are recommended during the detailed design phase to confirm the condition of the infrastructure and ensure that any reuse of existing systems aligns with current standards.

### 9.12.2 Proposed Stormwater Management Strategy

The proposed stormwater management strategy aims to address the limitations of the existing system while accommodating the redevelopment. Key components of the strategy include:

- **Minor Stormwater Drainage System:** The stormwater drainage system will be upgraded to ensure adequate capacity for minor storm events up to the 20% Annual Exceedance Probability (AEP), 10% AEP, and 5% AEP. The new system will prevent adverse impacts on surrounding properties and maintain compliance with City of Sydney stormwater guidelines.
- **Major Drainage Systems (Overland Flow):** The proposed development will incorporate overland flow paths to manage major storm events (up to the 1% AEP). These paths will ensure that the development does not exacerbate flooding risk in neighbouring areas. The topography will remain largely unchanged, preserving the existing overland flow routes along the southern and western boundaries.
- **On-Site Detention (OSD):** Multiple below-ground OSD tanks will be distributed across the precinct to control the post-development runoff flow rates. The OSD system will be designed to meet Sydney Water's stormwater quantity controls and ensure no increase in runoff beyond pre-development levels.
- **Stormwater Quality Management:** WSUD principles will be applied, incorporating treatment devices such as Gross Pollutant Traps (GPTs) and stormwater filtration cartridges. The GPTs will remove gross pollutants like sediment and debris, while the filtration cartridges will treat suspended solids, hydrocarbons, and nutrients.

### 9.12.3 Assessment

The proposed stormwater system has been designed to meet City of Sydney targets for pollutant reduction being:

- 90 per cent reduction in gross pollutants
- 85 per cent reduction in total suspended solids
- 65 per cent reduction in total phosphorus
- 45 per cent reduction in total nitrogen

A capacity assessment was performed using the DRAINS model to compare pre-development and post-development stormwater flows. The results indicate that the proposed system will prevent any increase in peak flows beyond the existing network's capacity, ensuring that downstream flooding risks are not exacerbated during major storm events (up to the 1% AEP)

- **Pre-development:** The existing system has been prone to surcharge, particularly during intense rainfall.
- **Post-development:** The proposed upgrades, including the integration of OSD and improved drainage infrastructure, will result in controlled runoff discharge, aligning with City of Sydney guidelines.

Therefore subject to the implementation of the proposed stormwater management strategy, the post-development flows will not exceed pre-development conditions for all design events.

### 9.12.4 Mitigation Measures

Subject to the implementation of the following mitigation measures outlined in **Appendix C**, no adverse impacts are expected as a result of the proposed development.

### 9.12.5 Conclusion

The proposed Stormwater Management Strategy for the Waterloo South redevelopment demonstrates a comprehensive approach to managing both the quantity and quality of stormwater runoff. By upgrading existing infrastructure and implementing modern stormwater treatment systems, the strategy ensures compliance with City of Sydney guidelines and mitigates the risk of downstream flooding. The integration of WSUD principles will enhance the precinct's environmental sustainability by reducing pollutant loads and improving water quality. This approach aligns with the objectives outlined in the 2022 Design Guide and Sydney DCP 2012.

## 9.13 Flood Risk

GRC Hydro has prepared a site wide Flood Impact and Risk Assessment (**Appendix AA**) to support the concept SSDA and future detailed applications.

### 9.13.1 Methodology

Flood risk has been assessed through a site-wide Flood Impact and Risk Assessment prepared in accordance with the NSW Flood Prone Land Policy, the City of Sydney Interim Floodplain Management Policy, the Sydney LEP 2012 and the SEARs.

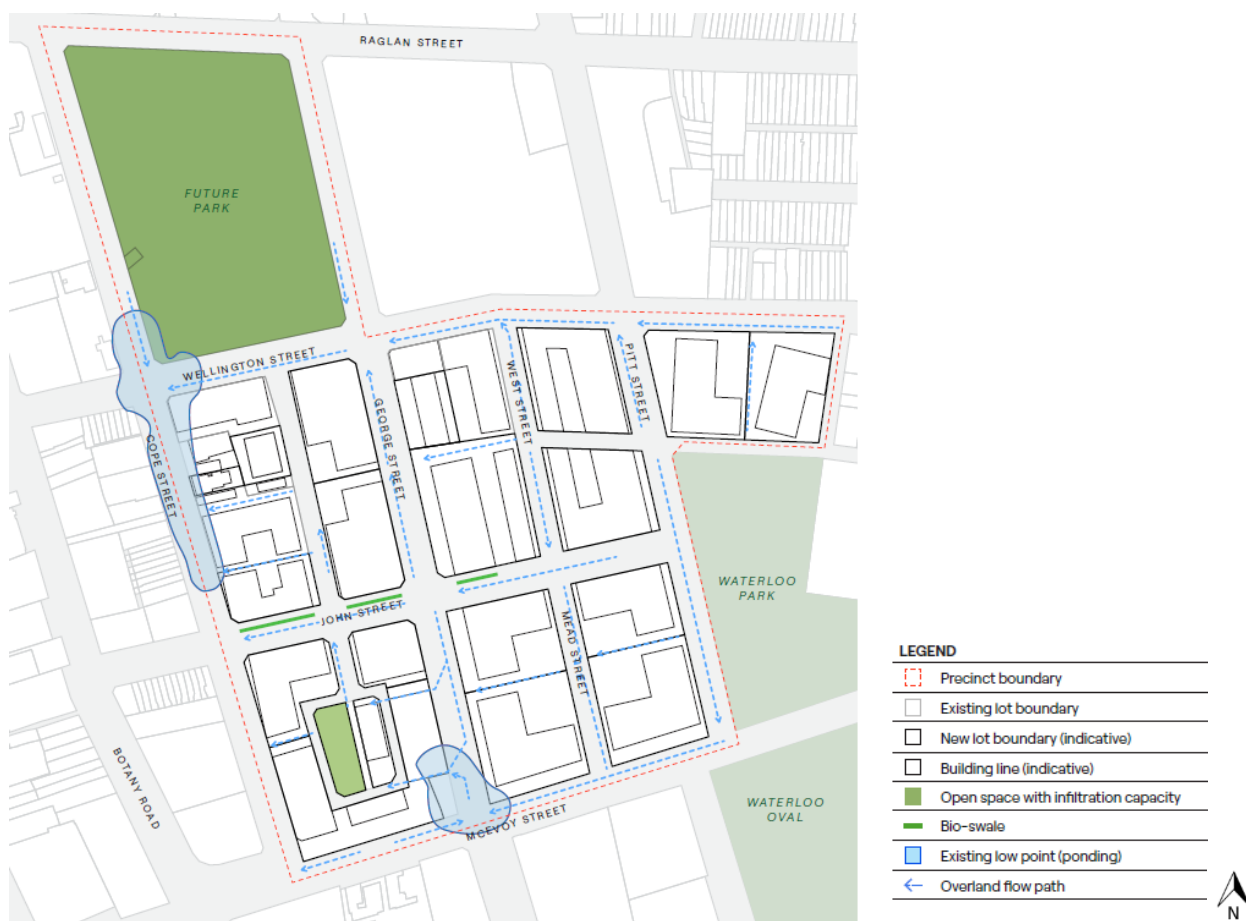
The assessment involved detailed hydraulic modelling of existing and post-development conditions across a range of design events, including the 1 per cent AEP event, the Probable Maximum Flood (PMF) and climate change scenarios. The City of Sydney have confirmed that the proposal should utilise the Alexandra Canal Catchment – Flood Study Model Update ARR2019 as the basis for the development.

The modelling assessed flood depths, velocities, hazard categories, flow paths and impacts on surrounding properties. The assessment also considered flood risk to people, buildings, access and emergency response, consistent with Flood Risk Management Guideline LU01 and Shelter-in-Place principles.

### 9.13.2 Existing Environment

GRC acknowledge that Waterloo South is located within a highly urbanise catchment which drains toward Alexandra Canal and is subject to overland flow flooding during intense rainfall events. Flood behaviour is primarily influenced by upstream catchment conditions, local road sag points and the capacity of the existing stormwater drainage network.

Existing flooding is generally characterised by shallow overland flow across much for the site, with deeper ponding and higher hazard conditions occurring at localise low points, particularly along George Street near McEvoy Street and Cope Street near Wellington Street (refer to **Figure 89**). These conditions are consistent with the established City of Sydney flood studies for the area and reflect the constraints of a fully developed inner-city catchment. Flooding across the site is typically short in duration and associated with high-intensity flooding rather than prolonged riverine flooding.



**Figure 89** Flood behaviours diagram

Source: Design Report prepared by SJB

### 9.13.3 Assessment

The assessment demonstrates that the concept scheme is compatible with the site’s existing flood behaviour and does not result in unacceptable flood impacts. Post-development modelling indicates that the proposed concept envelopes, road layout and drainage strategy generally maintain existing flood levels and flow paths across the site and do not cause material increases to flood levels of adjoining properties.

Where minor, localised changes in flood behaviour were identified in preliminary modelling, these were shown to be capable of being mitigated through detailed design refinement at future planning stages, without altering the overall flood function of the site.

The assessment recognises that given the highly urbanised nature of the catchment, opportunities for precinct-scale flood mitigation are limited and that flood management must focus on risk avoidance and resilience rather than redistribution of floodwaters.

Flood risk to future occupants has been assessed as acceptable, provided that appropriate flood planning levels are applied in future detailed designs. The concept establishes a built form framework which enables habitable spaces, sensitive land uses and building entries to be located above relevant flood levels with appropriate freeboard. Basement access and below ground areas can be designed to prevent flood ingress through detailed design at subsequent detailed application stages.

Emergency response considerations have been assessed in recognition of the rapid onset and short duration of flooding. During extreme events, surrounding road networks may experience hazardous conditions, limiting the feasibility of evacuation. Consistent with best practice for flash-flood-affected urban areas, a shelter-in-place approach is considered appropriate, with refuge available within buildings above flood-affected levels. This approach is supported by the proposed building form and access arrangements and does not rely on large-scale evacuation during flood events.

The impacts of climate change have been explicitly considered in the Flood Impact and Risk Assessment. While future climate scenarios indicate increases in flood depth and hazard at certain locations, these changes do not materially alter flood behaviour across the site or introduce new risks that would preclude redevelopment.

As outlined by the City of Sydney in their advice on the request for SEARs the Flood Impact and Risk Assessment is required to identify the Flood Planning Levels for each building to ensure that the proposed building envelopes respond to and resolve any required flood planning levels. **Table 31** demonstrates the levels proposed by reference scheme comply with the determined Flood Planning Levels across the site. It is concluded that the application of Flood Planning Levels and adaptive design measures provides an appropriate response to future flood risk.

**Table 31** Flood Planning Levels

Building	Flood Planning Level Category	Flood Planning Level	Reference Scheme Proposed Level
2D-B1 1	Basement	16.61	16.75
2D-B1 2	Basement	16.61	16.75
2D-B1 3	Basement	16.61	16.70
2D-B1 4	Residential Non-habitable	15.72	15.92
3A-B1 5	Basement	16.98	17.33
3B-B1 6	Basement	16.89	17.24
3B-B1 7	Basement	16.61	16.76
4B-B1 8	Residential Non-habitable	17.1	17.3
4C-B2 9	Basement	17.50	17.6
4C-B1 10	Residential	18.30	18.3
4C-B1 11	Basement	19.30	19.3
4C-B2 12	Basement	21.20	22.1
5A-B1 13	Basement	TBD	21.81
5A-B1 14	Basement	27.98	30.01
5A-B2 15	Residential	TBD	21.55
6A-B1 16	Residential	31.63	32.38
6A-B2 17	Residential	22.7	22.78
7A-B1 18	Basement	0.3 above ground	40.3
7B-B1 19	Basement	29.85	30.7
7B-B1 20	Basement	0.3 above ground	30.7

Building	Flood Planning Level Category	Flood Planning Level	Reference Scheme Proposed Level
8A-B1 21	Basement	16.61	16.91
8A-B1 22	Basement	16.77	16.91
8A-B2 23	Residential	N/A	17.39
8A-B3 24	Basement	17.31	17.38
8A-B3 25	Basement	17.36	17.38
8B-B1 26	Basement	16.61	16.76
8B-B1 27	Residential	16.61	16.76
8C-B1 28	Basement	16.61	17.01
8C-B1 29	Basement	17.36	17.38
9A-B1 30	Basement	17.36	17.39
9B-B1 31	Basement	0.3 above ground	17.38
9B-B1 32	Residential	0.3 above ground	0
10B-B1 33	Basement	21.75	21.75
10B-B1 34	Basement	0.3 above ground	29.95

### 9.13.4 Mitigation Measures

Flood risk mitigation for the site is primarily addressed through avoidance and design based measures, including:

- Application of appropriate Flood Planning Levels and freeboard for habitable and sensitive land uses (see **Table 31** above).
- Design of building entries, basements and services to prevent flood ingress
- Retention of existing overland flow paths and avoidance of floodwater displacement to surrounding properties
- Provision for detailed stormwater management and drainage works to be resolved at subsequent development stages
- Incorporation of shelter-in-place principles within building design and layout

Detailed mitigation measures, including final ground levels, floor levels and drainage infrastructure, will be confirmed through future detailed applications supported by detailed flood assessments.

### 9.13.5 Conclusion

The flood risk assessment concludes that the built form established by the concept SSDA will not result in unacceptable flood risk impacts. The development is compatible with the existing flood behaviour, does not adversely affect surrounding properties, and incorporates an appropriate framework for managing flood risk to people and property.

Flood related matters that require further refinement can be satisfactorily resolved through detailed design at subsequent approval stages.

## 9.14 Traffic, Transport and Accessibility

A Transport Impact Assessment (TIA) has been prepared by PTC Consultants (PTC) to assess the potential traffic, transport and accessibility impacts associated with the concept development (**Appendix CC**).

### 9.14.1 Methodology

As the concept SSDA seeks approval for maximum development parameters rather than detailed building design or final access arrangements, the assessment focuses on strategic network performance, access principles, parking provisions and mode share outcomes, with further detailed assessment to be undertaken at subsequent detailed application stages.

Several historical planning approvals and assessments undertaken for the site have been referenced by PTC in their transport assessment, including the previous transport assessments undertaken for the site include the *Waterloo South Planning Proposal Transport Study* prepared by Jacobs in March 2020 to support the original (2020) Waterloo South Planning Proposal and the City of Sydney Planning Proposal.

### 9.14.2 Existing Environment

The Waterloo South Precinct Area is located within a highly accessible inner-city location with excellent access to public transport, active transport infrastructure and the strategic road network. Key characteristics of the existing transport environment include:

- proximity to Waterloo metro station, providing frequent rail services to Sydney CBD, Green Square, Sydenham and the broader metropolitan network;
- access to heavy rail services at Redfern station within walking distance;
- a comprehensive bus network operating along Botany Road, Elizabeth Street and surrounding corridors;
- established cycling infrastructure, including existing and planned cycle routes along Wellington Street and George Street;
- a mixture of State (Botany Road and McEvoy Road and local roads (Wellington Street, Raglan Street, George Street, Cope Street, Pitt Street, Mead Street, Cooper Street);
- a street network that supports low vehicle speeds and high pedestrian activity, particularly within residential streets; and
- approximately 203 on street car parking spaces and five (5) other spaces designated as loading zone, authorised vehicle parking only or bus zones are within the precinct area.

The site is located within an area identified as having very high public transport accessibility, and existing travel behaviour data demonstrates comparatively low private car mode share and higher use of public and active transport modes.

### 9.14.3 Assessment

#### Access and Movement

The concept SSDA establishes a clear and legible access framework that responds to the site's urban context, surrounding road hierarchy and proximity to high-capacity public transport. Vehicular access to the precinct is intentionally limited and consolidated to minimise traffic intrusion and prioritise pedestrian movement and public domain quality.

The proposed Design Guide updates include the minimum requirements for the precinct's internal road network. In contrast to the existing road condition the revised Design Guide underpins a key move to give priority to pedestrians, improve active transport and reduce vehicular movements through the precinct. This is proposed by reducing vehicular lanes to enable wider footpaths, more landscaping and slow traffic to create a safer pedestrian environment. The proposed street network and road width are depicted in **Figure 90**.



**Figure 90** Proposed street network

Source: Waterloo South Design Guide

Primary vehicle access to the precinct is proposed via Wellington Street, with internal streets designed as low-speed environments that balance local access requirements with pedestrian and cyclist priority. The access framework reflects the structure established in the 2022 Design Guide, with targeted refinements informed by traffic assessment and consultation with relevant authorities. It is further noted the City of Sydney are seeking to pursue a left in and left out from George Street, to McEvoy Street, however these discussions have not been finalised and will be assessed during the future detailed applications.

The TIA confirms that the proposed access arrangements are appropriate for the scale and nature of development proposed and are capable of supporting safe and efficient vehicle movements, including emergency access, servicing and waste collection, subject to detailed design at future SSSA stages.

Pedestrian connectivity is significantly enhanced through the introduction of new streets, through-site links and upgraded footpaths, improving permeability across the precinct and strengthening connections to Waterloo metro station, surrounding neighbourhoods and public open spaces.

### Traffic Generation and Network Performance

Traffic generation associated with the concept development has been estimated having regard to the proposed land use mix, dwelling yield, parking provision and the site's high public transport accessibility and has been compared to the trip generation proposed and ultimately approved under PP-2021-3265. Vehicular trip generation has been benchmarked against the traffic outcomes previously approved under PP-2021-3265 to provide a robust comparative assessment, the results of which are identified in **Figure 91**.

The assessment retains a conservative 20 per cent private vehicle mode share, consistent with the approved Jacobs assessment for PP-2021-3265. This approach does not assume a reduction in private vehicle use, notwithstanding the introduction of the Sydney Metro City Line with a station immediately adjacent to the precinct, and broader changes in travel behaviour since the earlier approval. Trip generation rates consistent with the 2024 Guide to Transport Impact Assessment have been applied to the concept SSSA.

Land Use	Number of Dwelling / Car Spaces Provided	Peak Hour	Trip Generation Rate	Trip Generation
Residential	3,067 dwellings	AM	0.14	429
		PM		429
Non-residential	114 car parking spaces	AM	0.4	46
		PM	0.8	91
Total		AM		475
		PM		520

PP-2021-3625 trip generation rates

Land Use	Number of Dwelling / GFA	Peak Hour	Trip Generation Rate	Trip Generation
Residential	3,300 dwellings	AM	Table 27	435
		PM		435
Non-residential	15,305m <sup>2</sup>	AM		76
		PM		76
Total		AM		511
		PM		511

Proposed trip generation

Peak Hour	LAHC (Jacobs)	Planning Proposal (CoS)	Concept SSSA	Variation	
				SSDA vs Jacobs	SSDA vs CoS
AM	507	475	511	+4	+36
PM	587	520	511	-76	-9

**Figure 91** Comparison of the vehicular trip generation under PP-2021-3625 and the concept SSSA

Source: Traffic Impact Assessment (proposed trip generation rates - Tables 26, 28 & 29) prepared by PTC

On this basis, the concept development is expected to generate a similar, and in some instances reduced, traffic impact on the surrounding road network compared to the previously approved scheme. Any potential changes to intersection arrangements at Wellington Street and Botany Road are expected to redistribute traffic within the local network without resulting in a material increase in overall network impacts. Accordingly, further detailed traffic modelling is not considered necessary at the concept stage.

The TIA demonstrates that expected vehicle trip generation is moderate relative to the scale of development, reflecting:

- the high proportion of social and affordable housing, which typically exhibits lower car ownership and vehicle trip rates;
- the immediate proximity of the site to Waterloo metro station and other high-frequency public transport services; and
- adherence to the maximum LEP car parking rates applicable to the site.

Strategic modelling of the surrounding road network indicates that traffic generated by the concept development can be accommodated without resulting in unacceptable impacts on the operation of key surrounding intersections or arterial roads, including Wellington Street and Botany Road, at a precinct-wide level.

While localised increases in traffic volumes are anticipated as redevelopment progresses, these are considered manageable within the context of the existing urban road network and will be further assessed and mitigated through detailed modelling at subsequent development application stages.

Overall, the concept development is considered supportable from a traffic generation and network performance perspective. As development proceeds on a block-by-block basis, transport demand management measures will be further refined through the preparation of Green Travel Plans accompanying future detailed development applications.

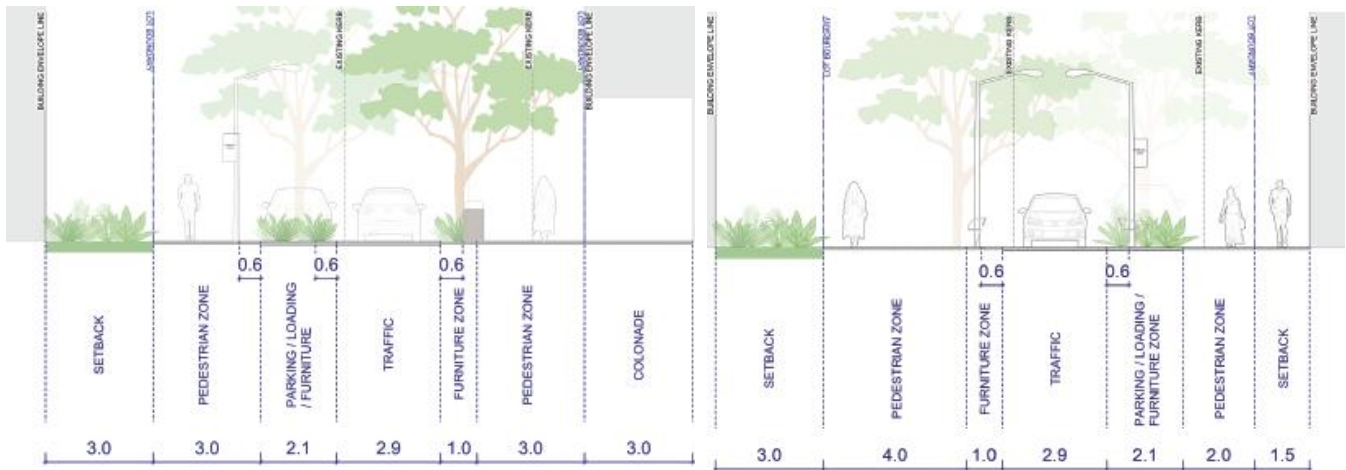
### **Public Transport, Walking and Cycling**

The TIA confirms that the site benefits from a very high level of public transport accessibility, with Waterloo metro station located within close walking distance and providing frequent, high-capacity services to key destinations across the Sydney metropolitan area. This level of accessibility underpins the reduced reliance on private vehicle travel assumed in the assessment.

Compared to the scheme approved under PP-2021-3265, the concept proposal places greater emphasis on public and active transport as the primary modes of movement within and through the precinct. A comparison between the 2022 Design Guide and proposed road conditions is provided in **Figure 92** with a photomontage of what George Street could look like (subject to future detailed design) provided at **Figure 93**. This shift is supported through a range of public domain and streetscape measures, including:

- reduced vehicular lane widths and prioritisation of pedestrian movement;
- widened footpaths and increased opportunities for landscaping and tree planting;
- activated street frontages along George Street and key east-west connections;
- integration with existing and planned cycling routes; and
- provision of bicycle parking and end-of-trip facilities in accordance with applicable controls.

The proposed upgrades to the road network are generally consistent with the road sections proposed in the Design Guide updates (refer to **Appendix E**).



**Figure 92** Cooper Street Section (2022 Design Guide shown on the left, updated design guide shown on the right)

Source: Landscape and Public Domain Design Report prepared by Aspect

The assessment concludes that the concept proposal will result in a net improvement to walking and cycling conditions compared to both existing conditions and the previously approved scheme. These improvements support mode shift toward sustainable transport options, enhance public domain amenity and reduce pressure on the surrounding road network.



Figure 144. Artist Impression of George Street

- 1 Streetside dining and activated frontages to promote activity from day to night, maintaining George Street as the key activity hub of the precinct.
- 2 Dedicated cycle lane to promote diverse modes of transport and mobility, using the Fold as the contemporary journey line between Warrane (Sydney Harbour) and Gamay (Botany Bay)
- 3 Retain mature trees integrated with new planting and water management to reflect on Wet and Dry Country within the public domain.

**Figure 93** Photomontage of George Street

Source: Design Report prepared by SJB

## Servicing, Waste and Emergency Access

Servicing, waste collection and loading are proposed to be accommodated within basement service areas or designated loading zones within development blocks. This approach minimises conflicts with pedestrian movement and reduces impacts on street operation.

Emergency vehicle access is achievable across the precinct via the proposed street network, subject to detailed design and compliance with relevant standards at future stages.

## Parking Provision and Management

### Car parking

Car parking on the site will be provided in accordance with the City of Sydney maximum car parking rates to support sustainable travel behaviour and to reflect the site's public transport accessibility. In accordance with the Sydney LEP 2012 the development precinct is categorised as Category A for residential land uses and Category D for non-residential land uses. These parking rates apply to private parking within the blocks, not on-street parking.

As is discussed in **Section 0** of the EIS, the LEP parking rates are proposed to be refined under the Sydney LEP Housekeeping Amendments, however, a savings provision is to be introduced for Waterloo South in relation to car parking, which will confirm that the car parking standards under the Sydney LEP 2012 as in force prior to the Housekeeping LEP being gazetted remain applicable to the concept SSDA.

The reference scheme submitted with this application includes the provision of approximately 1,500 parking spaces, which is below the maximum rate permitted and reflective of the housing tenures proposed and the site's accessible location. Parking is proposed to be located predominantly within basement levels and access to basement parking is only provided on Pitt Street, John Street, West Street and Mead Street to minimise impacts on the public domain and streetscape and to comply with the proposed Design Guide updates. The concept public domain plans maintain opportunities for on-street parking and on-street loading areas on City of Sydney owned roads, as depicted in **Figure 93**.

Retail parking for the precinct is proposed to be consolidated within Block 9, as opposed to providing a small number of retail spaces per block. The consolidation of permitted retail car parking within one block is proposed to support the functionality of a supermarket, where parking demand is greater than for individual shops or non-residential tenancies. This allocation of retail parking will result in a more convenient car parking allocation for users of the retail premises, than splitting the retail parking across blocks which would likely result in these spaces being allocated to staff as opposed to customers of the retail premises.

The reference scheme design includes approximately 1,500 private car parking spaces, together with an indicative provision of 32–50 spaces to support potential car sharing schemes. These figures have been prepared for the purposes of the reference scheme only and are provided as an example of how parking may be distributed across the site. The final car parking provision for residential uses will be determined at the detailed application stage in accordance with the maximum parking rates established by the Sydney LEP 2012 and the savings provisions proposed under the Housekeeping Amendments (refer to Section 6.3.4).

Detailed swept paths have been prepared by PTC for each proposed driveway within the precinct to confirm access is achievable as provided at **Appendix CC**. The largest anticipated vehicle to make use of each driveway has been anticipated as a 9.25m Council refuse vehicle. The following diagrams demonstrate that vehicular access to each of the basements is achievable.

### Bicycle Parking

Bicycle parking can be accommodated on the site with regards to the requirements of the Sydney DCP 2012. Based on the land uses and distribution proposed under the reference scheme, 3,824 bicycle spaces are required across the site comprising a mixture of residential and retail/ commercial spaces.

End of trip facilities are required to be provided to support non-residential uses. The reference scheme development would require the provision of 85 individual lockers and 19 shower/ change rooms for the staff of the precinct.

## Construction Traffic and Staging

The concept proposal includes a staged delivery approach, which will influence construction traffic generation over time. While construction impacts have not been assessed in detail at the concept stage, the TIA confirms that construction traffic can be appropriately managed through future Construction Traffic Management Plans prepared for each detailed SSDA.

These plans will address haul routes, access arrangements, timing of deliveries and measures to minimise impacts on surrounding streets and sensitive receivers.

### 9.14.4 Mitigation and Management Measures

The concept SSDA retains flexibility for amendments to be made to suit the evolving nature of the precinct, including the option to vehicular enable access from George Street to McEvoy Street if deemed to be required in the future.

### 9.14.5 Conclusion

Overall, the TIA demonstrates that the concept development can be delivered without giving rise to unacceptable traffic, access or parking impacts at a strategic level. The assessment confirms that the site's exceptional accessibility, combined with a reduced car parking provision and a strong focus on walking, cycling and public transport, will moderate traffic generation and support sustainable travel outcomes.

Any site-specific or stage-specific impacts will be addressed through detailed traffic modelling and management measures at future detailed application stages.

## 9.15 Noise and Vibration

The EIS is accompanied by a Noise and Vibration Impact Assessment (NVIA) prepared by E-Lab Consulting (**Appendix BB** above). The assessment considers the likely impacts of noise and vibration from surrounding land uses on the proposal and the proposal's impacts on neighbouring sensitive receivers (from operation and construction).

### 9.15.1 Methodology

The NVIA was undertaken in accordance with relevant NSW legislation, policies and guidelines, including the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, the *Development near Rail Corridors and Busy Roads – Interim Guideline*, and applicable EPA and Transport for NSW guidance. The assessment methodology included the following key steps:

- Identification and classification of sensitive receivers proximate to the development site.
- Identification and classification of noise and vibration sources generated by the proposed development, together with external noise and vibration sources impacting the proposed development.
- Site noise investigations to quantify the background noise levels local to the proposed development.
- Determination of the applicable noise and vibration criteria.
- Assessment of the operational and construction noise and vibration impacts associated with the proposed development to surrounding residential receivers, including;
  - Road noise intrusion into the development from traffic movement on surrounding local roads
  - Vibration impacts from nearby underground rail and metro infrastructure
  - Noise and vibration impact of mechanical plant and equipment serving the proposed development on surrounding noise and vibration sensitive receivers
  - Noise impacts of additional traffic on surrounding local roads generated by the proposed development
  - Construction noise and vibration assessments
- Establishment of mitigation measures requires to alleviate noise and vibration impacts to achieve the project noise and vibration criteria.

### 9.15.2 Existing Environment

E-Lab Consulting conducted short-term attended noise monitoring on 17 June 2025 between 10:30am and 12:00pm and long term unattended noise monitoring between Tuesday 18 November 2025 to Thursday 27 November 2025 at the locations shown in **Table 32** to establish the site's existing conditions.



**Figure 94** Noise monitoring locations and surrounding sensitive receivers Source: Noise and Vibration Impact Assessment prepared by E-Lab

Using these measurements, the NVIA established:

- The Rating Background Noise Level (RBL) across the site, as presented in **Table 32**.
- The site's existing traffic noise levels as presented in **Table 33**.

**Table 32** Rating Background Noise Levels

Receiver (see Figure 94)	Measured Rating Background Noise Levels -L90 dB(A)		
	Day	Evening	Night
LT1	42	40	36
LT2	48	47	45
LT3	44	43	37
LT4	43	41	37
LT5	46	43	38
LT6	50	56	42

**Day** – the period from 7:00am to 6:00pm Monday to Saturday, 8:00am to 6:00pm Sundays and Public Holidays

**Evening** – the period from 6:00pm to 10:00pm

**Night** – the period from 10:00pm to 8:00am

**Table 33** Long-term traffic noise monitoring results

Location (see Figure 94)	Measured Traffic Noise Levels	
	Day (7am-10pm)	Night (10pm-7am)
LT1	56	49
LT2	59	51
LT3	56	50
LT4	55	49
LT5	57	50
LT6	70	66

### 9.15.3 Assessment

The NVIA presents the proposal's relevant noise and vibration criteria for:

- Internal noise levels, including those provided in *State Environmental Planning Policy (Transport and Infrastructure) 2021* and the '*Development near rail corridors and busy roads – interim guideline*' acoustic criteria, for residential accommodation adjacent to a rail corridor/ transitway and the Waterloo South Design Guide 2022.
- Road traffic noise generation.
- Noise emissions.
- Construction noise.
- Operational and construction vibrations.

The NVIA models the proposed noise and vibration impacts outlined below against the above-listed criteria. The following noise impacts have been identified:

- **Mechanical services:** Mechanical plant selections have not been finalised at this stage. A detailed acoustic review will be undertaken during design development and appropriate mitigation incorporated to ensure compliance with external noise emission criteria.
- **Car park operations:** Car parking is proposed within enclosed ground/basement levels. Accordingly, car park operational noise is not expected to result in adverse impacts to nearby noise-sensitive receivers and relevant criteria are anticipated to be met, subject to detailed design.
- **Loading docks and vibration:** Detailed loading dock noise assessment will be completed as part of future SSDAs once operators and dock layouts are confirmed. Concept measures include enclosed dock operation to minimise breakout, engine-off practices during loading/unloading where feasible, and on-site vehicle speeds limited to 10 km/h. Structural vibration isolation will be incorporated where heavy vehicle movements and equipment (e.g. pallet jacks/turntables) occur beneath residential areas.
- **Traffic airborne noise intrusion (façade and internal amenity):** Road and rail noise impacts at building façades have been modelled using a 3D acoustic model. Results are presented for "windows closed" internal amenity. A preliminary "windows open" assessment indicates that where internal noise limits cannot be achieved with natural ventilation, affected habitable rooms will require alternative ventilation compliant with the NCC (e.g. AS 1668.2 and AS/NZS 3666.1). Mitigation will be refined at later stages.
- **Rail structure-borne noise and tactile vibration:** Detailed assessment will be undertaken at future SSDA stages following rail vibration measurements, with building vibration isolation requirements incorporated into detailed design where necessary.
- **Retail/commercial and food and beverage noise:** As tenant uses and hours are not yet confirmed, detailed operational noise assessment will be addressed at subsequent stages. Preliminary measures include operational management controls (hours/patron/music limits where required), façade and building acoustic treatments (including isolated ceilings where non-residential uses sit beneath apartments), and patron signage to minimise disturbance.
- **Traffic noise generation and parks:** Development traffic generation is generally consistent with, or lower than, previously approved scenarios and any change in traffic noise is predicted to be negligible. Predicted traffic noise at the proposed park (Block 8) is approximately consistent with guidance for passive open space and comparable to nearby parks.

The NVIA concludes the proposed redevelopment is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to noise and vibration subject to appropriate mitigation.

#### **9.15.4 Mitigation and Management Measures**

The NVIA's measures are included in the proposal's consolidated list of mitigation and management measures at **Appendix C**.

### **9.16 Aviation**

The Aviation Impact Assessment has been prepared by Arup (**Appendix GG**) to assess the potential impacts of the Waterloo South development on aviation safety, specifically in relation to the Sydney Kingsford-Smith Airport. The assessment considers relevant airspace protection surfaces, construction activities, and other safeguarding requirements under the Sydney LEP 2012, the *Airports Act 1996*, and the National Airports Safeguarding Framework (NASF).

The key objectives of the assessment are to ensure that the proposed development will not pose a risk to aviation operations or airspace integrity during both construction and operation phases. The development includes a range of low, mid, and high-rise structures with a focus on mixed-use development, including social, affordable, and market housing. The height of buildings ranges from 1 storey to 33 storeys, with the potential for cranes and temporary construction structures to exceed the final building heights during construction.

#### **9.16.1 Methodology**

The aviation impact assessment was conducted in accordance with the following key guidelines and frameworks:

- Sydney LEP 2012: Specifically clause 7.16, which addresses airspace operations and sets out the protections for Sydney Airport's airspace.
- Airports Act 1996: Governs the protection of airspace around leased federal airports, including the Sydney Airport.
- National Airports Safeguarding Framework (NASF): Guidelines that ensure aviation safety requirements are considered in land-use planning, particularly for developments near airports.

The assessment focused on key airspace surfaces, including the Obstacle Limitation Surface (OLS) and Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS). Additional considerations for wildlife strikes, lighting, and noise were also addressed as per NASF guidelines.

#### **9.16.2 Airspace Protection Assessments**

The OLS protects aircraft safety by ensuring that no obstacle infringes the approach or departure paths to Sydney Airport. The development is located within the conical surface of the OLS, where elevations range from 54m to 76m AHD. Thirteen buildings are planned to permanently exceed this surface, which requires the submission of an application for a controlled activity.

The critical PANS-OPS surface for the Waterloo South development is identified at 126.4m AHD. This surface represents the maximum height at which buildings can reasonably expect approval. Four high-rise buildings are planned to reach but not exceed this elevation, while cranes during construction are anticipated to temporarily exceed this limit. The Radar Terrain Clearance Charts (RTCC) chart for Sydney Airport shows a minimum safe altitude of 335.28m AHD, which is well above the planned heights for the Waterloo South development. Therefore, the RTCC is not expected to impact the development.

Combined Radar Departure Assessment Surfaces (Omni Directional) provide a safety buffer for obstacle clearance during radar-vectorized departures from Sydney Airport. The surfaces range from 165m to 180m AHD, which is well above the proposed building heights. However, these surfaces will impact crane operations during construction.

A temporary Strategic Helicopter Landing Site (SHLS) at the Royal Prince Alfred Hospital, approximately 2.1 km northwest of the site, is the closest relevant landing site. The assessment found no significant impacts from the development, as the site is outside the 500ft approach and departure path of the SHLS.

Given the proximity to Sydney Airport, the possibility of attracting hazardous wildlife must be considered. The proposed park located on the north-west corner of the Waterloo South Precinct Area would meet the definition of a park/playground which will require the implementation of mitigation measures to offset the potential of the park as attracting wildlife.

### 9.16.3 Mitigation Measures

To address the impacts on airspace protection surfaces, the following mitigation measures will be implemented:

- **Crane Height Restrictions:** Temporary intrusions into airspace during construction due to cranes will be mitigated by limiting crane heights to below PANS-OPS surfaces.
- **Obstacle Lighting:** Buildings that exceed the OLS surfaces will be required to install obstacle lights to enhance visibility and safety.
- **Controlled Activity Approvals:** Applications for controlled activities will be submitted to the relevant authorities (e.g., Sydney Airport) for approval, with ongoing monitoring during construction to ensure compliance with aviation safety regulations.
- **Wildlife Strikes:** Further advice should be sought from a wildlife hazard expert advice at detailed application stage given the potential for Village Green to attract wildlife that could be hazardous to Sydney Airport.

### 9.16.4 Conclusion

The Aviation Impact Assessment for the Waterloo South development demonstrates that, with appropriate mitigation measures in place, the proposed development will not significantly compromise aviation safety or operations at Sydney Airport. The planned building heights, while exceeding some airspace surfaces, can be accommodated within the existing aviation safeguarding framework through controlled activity approvals and compliance with lighting and crane operation restrictions. The development aligns with the safeguarding policies outlined in the Sydney LEP 2012 and NASF guidelines, ensuring aviation safety while supporting urban renewal and the provision of essential housing and services.

## 9.17 Waste Management

The EIS is accompanied by a Waste Management Plan (WMP) (**Appendix DD**) prepared by WSP that identifies and quantifies the proposal's likely waste streams during the proposal's operation and provides measures to manage, reuse, recycle and safely dispose of waste.

As the application is at concept stage, the assessment focuses on demonstrating that appropriate waste systems and servicing corridors can be accommodated and committed to, with refinement to occur at detailed SSDA / DA stages for each block and building.

### 9.17.1 Assessment

#### Operational Impacts

The precinct will generate operational waste from residential dwellings, non-residential uses and community uses. Indicative collection provisions for these uses include:

- **Residential:** approximately ~102 x 1100L garbage bins (3x/week) and ~190 x 1100L recycling bins (2x/week), plus bulky waste (weekly) via City of Sydney collections;
- **Non-residential:** private contractor collections for garbage, recycling, cardboard bales and organics (generally 3x/week as a concept allowance); and
- **Community:** City of Sydney collections for garbage and recycling, plus bulky waste (weekly).

At concept scale, the proposed separation and collection frequencies are sufficient to manage expected volumes and reduce the risk of overflow (and related litter/vermin impacts), subject to detailed design confirming waste room sizing and fit-out per block. The mitigation measures attached in **Appendix C** will ensure future impacts are appropriately managed.

Given the precinct scale, bins will be transferred internally by facilities management between buildings and shared loading docks, predominantly through basement areas and outside peak activity periods. Mechanical bin tugs will be utilised to reduce manual handling and support longer transfer routes. Potential impacts relate to conflicts between vehicle movement in basements and interactions in public areas. These impacts will be mitigated by:

- keeping transfers within the precinct boundary and avoiding stairs / steep gradients where possible;
- undertaking transfers outside peak periods; and
- presenting bins in designated holding zones near loading docks for direct collection.

The concept provides eight on-site loading docks for waste collection across most buildings, with turntables / turnaround areas to enable vehicles to enter and exit in a forward direction. Where on-site loading is not feasible for a small number of buildings, limited on-street collection points are identified, with strict controls to avoid permanent storage of bins outside the title boundary. The loading docks have been designed to accommodate 9.25m collection vehicles, as confirmed in the swept paths diagrams at **Appendix CC**.

Overall, the concept servicing approach reduces reliance on kerbside collections and concentrates servicing within purpose-designed loading docks, which is expected to result in minimal traffic/amenity impacts that can be appropriately managed at detailed design stage.

### Construction waste impacts

Construction and demolition activities will generate significant waste streams (concrete, masonry, metals, plasterboard, timber, packaging and general waste), plus potential hazardous wastes depending on existing building fabric. The concept strategy requires:

- a Construction Waste Strategy within a Construction Management Plan for each works package;
- on-site segregation and storage to maximise recovery and reduce landfill disposal;
- a target of 90% diversion from landfill for construction waste; and
- education of subcontractors and site personnel regarding separation and recovery requirements.

Hazardous materials will be managed via separate Hazardous Materials Surveys for each construction package where applicable and with specialist contractors and compliance with WHS obligations.

Collections will be undertaken by private contractors in accordance with the relevant construction traffic management arrangements and within approved work hours.

With these controls, construction waste impacts are anticipated to be temporary and capable of being reduced to acceptable levels. Further detail on the proposed mitigation measures is provided in **Appendix DD**.

## 9.18 Ecologically Sustainable Development

A preliminary Ecologically Sustainable Development (ESD) Strategy has been prepared by WSP to support the concept SSDA (refer to **Appendix FF**). The strategy outlines the proposals commitment to sustainability through an integrated approach, guided by relevant sustainability frameworks and a vision for a resilient, environmentally responsible, and socially inclusive precinct.

### 9.18.1 Methodology

The assessment of the Waterloo South development against ESD criteria was undertaken through the following methodology:

- **Review of Relevant Guidelines and Standards:** The project's ESD performance was evaluated against applicable sustainability frameworks, including SEARs, the Sustainable Buildings Policy, and the 2022 Design Guide.
- **Benchmarking Against Sustainability Ratings:** The project's sustainability outcomes were measured using third-party rating systems, including Green Star, NABERS, BASIX, and NatHERS, to ensure compliance with required standards.
- **Collaborative Approach:** The development process incorporated input from multiple stakeholders, including environmental consultants, community representatives, and First Nations advisors, ensuring diverse perspectives in shaping sustainable outcomes.
- **Impact Assessment:** The evaluation addressed both the environmental and social impacts of the development, assessing its long-term viability in terms of climate resilience, biodiversity, and community wellbeing.

### 9.18.2 Existing Environment

Key features of the existing environment include:

- **Land Use:** A blend of social and private housing, office spaces, and community facilities.
- **Ecological Features:** The site lies within a region of high urban intensity, with limited green space. The surrounding precincts have experienced development pressures that affect local biodiversity and natural ecosystems.
- **Climate and Environmental Context:** Waterloo South is located in a climate zone that experiences both extreme temperatures and urban heat effects, making climate resilience a crucial focus for the project.

### 9.18.3 Assessment

The assessment of ESD for Waterloo South focuses on key principles of sustainability, including carbon emissions reduction, energy efficiency, water conservation and community resilience.

#### Upfront carbon, embodied emissions and energy

The development is committed to reducing embodied carbon and operational energy consumption. Key outcomes include:

- **Carbon emissions:** The project targets a minimum 40% reduction in upfront embodied carbon through material efficiency and low carbon alternatives.
- **Energy Efficiency:**
  - Green Star: The precinct is committed to achieving a 6-Star rating (v1:1) under the Green Building Council of Australia Green Star Communities rating, with all residential building elements targeting a minimum 5-Star (v1 Rev C) rating under the Green Building Council of Australia Green Star Buildings rating.
  - BASIX: The residential components of the project will comply with BASIX requirements, ensuring minimum energy and water efficiency, thermal comfort, and material standards.
  - NABERS: Retail spaces, where applicable, will achieve a minimum 5-Star NABERS Energy rating and a 4-Star NABERS Water rating.
  - NatHERS: A minimum average NatHERS rating of 7 stars across all residential buildings, ensuring high thermal comfort and energy performance.

#### Resilient Neighbourhood

The development incorporates resilience strategies to mitigate climate risks and enhance the long-term sustainability of the community:

- **Climate Adaptation:** Resilience to urban heat and stormwater management is integrated into the design, with a focus on green infrastructure and water-sensitive urban design.
- **Social Resilience:** The precinct promotes social equity through the provision of affordable housing, community services, and public open spaces. These features aim to foster a strong sense of belonging and community cohesion and includes the delivery of a Social Enterprise Incubator.
- **Economic resilience:** The proposal will include the delivery of a Skills Exchange and Redeployment Centre.

#### Culture, Place, and Identity

A central principle of the project is **Designing with Country**, which recognises and respects the cultural significance of the site while embedding Aboriginal knowledge, values, and connection to place within the planning and design process. The project also commits to delivering secure, appropriate, and culturally responsive housing outcomes for Aboriginal people. This commitment is supported through the following initiatives:

- **First Nations Consultation:** Ongoing engagement with local Elders, knowledge holders, and custodians is to inform design development and project delivery.
- **Cultural integration:** Aboriginal cultural narratives and design elements are to be embedded within the built form, landscape, and placemaking strategy to strengthen social sustainability, connection to community and Country.
- **Housing provision:** The proposal includes independent living units for Aboriginal seniors within seniors housing, together with the allocation of 20 per cent of social housing (by GFA) and 15 per cent of affordable housing (by GFA) for Aboriginal households to support secure and culturally appropriate housing outcomes.
- **Public art:** A precinct-wide public art strategy has been established and will be implemented across the site to celebrate Aboriginal culture and identity.

#### Nature Positivity and Biodiversity

Efforts to improve biodiversity on-site include:

- **Greening and Landscaping:** Incorporation of native plant species and green infrastructure to support local wildlife and enhance urban ecology.
- **Water Management:** Rainwater harvesting systems, efficient water fixtures, and integrated stormwater solutions to minimize environmental impact and improve resource efficiency.

The implementation of the above will ensure that future development can meet the sustainability requirements as outlined in the proposed Design Guide updates.

#### 9.18.4 Mitigation Measures

The following mitigation measures have been incorporated into the design to address potential negative environmental and social impacts:

- **Climate Change Mitigation:** Implementation of energy-efficient systems, solar power integration, and the use of low-emission materials to reduce the overall carbon footprint.
- **Water Conservation:** Installation of water-efficient appliances, rainwater harvesting systems, and low-water-use landscaping to reduce reliance on potable water.
- **Biodiversity Protection:** Protection and enhancement of existing green spaces, with strategic planting to support local biodiversity and address urban heat island effects.
- **Community Engagement:** Continuous engagement with stakeholders, including local communities and First Nations representatives, to ensure that the project meets the needs of all affected groups.

#### 9.18.5 Conclusion

The Waterloo South redevelopment project demonstrates a strong commitment to ESD through the integration of sustainability principles into every stage of the design and planning process. The application of advanced sustainability frameworks and benchmarks, combined with ongoing stakeholder engagement, ensures that the project will deliver a resilient, energy-efficient, and socially inclusive precinct. By addressing key issues such as carbon emissions, water management, and community resilience, the project contributes to the long-term sustainability of the Waterloo South precinct and aligns with state and national sustainability goals.

### 9.19 Social Impact

A Social Impact Assessment (SIA) has been undertaken by Urbis (**Appendix EE**) in support of this concept SSDA, which considers the potential positive, negative and cumulative social impacts associated with the proposal, identifies and suggests mitigation and enhancement measures to minimise negative impacts and maximise social benefits to the community. A summary of this SIA is provided below.

#### 9.19.1 Methodology

A SIA social baseline, field study, impact scoping and assessment was completed in order to prepare the supporting report. The methodology, informed by the Department's SIA Guideline and Technical Supplement includes a risk assessment, whereby the magnitude of the impact is compared against the likelihood of the impact occurring.

#### 9.19.2 Existing Environment

The existing environment provides a social baseline for the assessment of the social impacts of the proposed development, and assists in identifying mitigation strategies or enhancement measures to improve social impacts that may result from the proposal.

In 2021 the immediate area accommodated 3,205 residents and was characterised by an older population demographic, with more than one third of the population aged over 65 and less than 5 per cent between the ages of 0 and 14. The area has a comparatively high proportion of Aboriginal and Torres Strait Islander people and an otherwise culturally diverse population. Around 32.5 per cent of residents were born overseas and reported speaking English not well, or not at all. Common languages other than English included Chinese and Russian.

Characterised by socio-economic disadvantage, the area comprises a high proportion of lone-person households (67.5 per cent) and approximately 80 per cent of residents live in social housing. Education trends indicate lower rates of university education and higher levels of vocational qualifications. The area experiences greater unemployment and significantly lower household incomes than other study areas. Elevated levels of long-term health conditions are also noted within the area.

Due to low levels of private vehicle ownership, walking and public transport are the dominant travel modes. Crime data also identifies Waterloo South as a localised crime hotspot, where rates of crime are higher than average across several categories.

### 9.19.3 Assessment, Mitigation Measures and Enhancement Strategies

The SIA undertook an assessment of social impacts resulting from the proposed concept across eight (8) categories. Whilst it is acknowledged that this proposal is for concept approval only and no physical works are proposed, the SIA provides an assessment of potential social impacts arising from the concept SSDA. Therefore, where relevant, the SIA identifies and makes commentary on social matters that could arise during construction and operation of the development, as well as that should be considered during the preparation of future detailed development applications.

**Table 34** outlines the anticipated social impacts of the proposal against each of these categories, without employing mitigation strategies and the anticipated social impact post implementation of recommended mitigation measures.

**Table 34** Assessment of the proposal against relevant social categories

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
<b>Way of life</b>			
Increase in housing supply and diversity in inner Sydney	Very high positive	The increase in housing supply and diversity is expected to substantially improve quality of life for individuals and families in the surrounding area. Implementing the balanced housing mix, as proposed in this concept SSDA will contribute to very high positive social impact.	Very high positive
Increase in social and affordable housing supply	Very high positive	The increase in social and affordable housing will significantly improve quality of life for low and low-to-moderate income households. The positive social impact will be reinforced as follows: <ul style="list-style-type: none"> <li>Homes NSW and CHPs will work closely with existing tenants to ensure all existing social housing tenants have the option of being placed in new social housing in the new development, or to be relocated to another home, dependant on their preference.</li> <li>A proposed on-site CHP support office located at the Waterloo South development will provide support to tenants who transition from existing to new housing on the development.</li> </ul>	Very high positive
Increase in Aboriginal housing in the Waterloo area	Medium positive	The increase in Aboriginal housing will also provide housing that is designed to better meet the needs of the local Aboriginal community. At least 20% of new social housing and 15% of new affordable housing at Waterloo South will be managed by an Aboriginal CHP and available to First Nations tenants. Further strategies such as ensuring the overall design reflects Country in accordance with the Urban Design Report ( <b>Appendix F</b> ) and Designing with Country Report ( <b>Appendix I</b> ) is also recommended.	Very high positive
Improved housing quality for existing and new social housing tenants in the Waterloo Estate	High positive	Existing and new tenants will have access to new and high-quality housing. Enhancement strategies are centred on aspects of future detailed design. New housing will be designed to align with the standards as outlined in Section 7.2.1.4 of the SIA.	Very high positive
Improved retail access and diversity	Low negative	Limited retail options reflect a short-term issue of minor magnitude given the strong demand for a diverse retail offering and limited local provision. <p>The proposal will result in improved social outcomes through the provision of appropriate retail.</p> <p>The proposal will include the delivery of a minimum 15,000m<sup>2</sup> of floorspace allocated to non-residential uses. This retail provision represents a significant improvement to the existing environment, offering opportunities to introduce a broader and more diverse range of goods and services than is currently available at Waterloo South or the Waterloo Estate more broadly.</p>	High positive

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
<b>Community</b>			
Changing social mix and impact on existing communities	High negative	The change in social and cultural mix that is expected to result from the proposal will impact the existing communities' sense of belonging and overall community cohesion. To improve the outcome of this category, the project commits to delivering inclusive shared spaces and places, social and economic development strategies, social procurement and investment in social infrastructure and services.	High positive
Significant physical, social and economic transformation of a longstanding community and associated social impacts of change	High negative	The significant physical, social and economic renewal that will be catalysed by the redevelopment of Waterloo South will be transformational. The implementation of the balanced housing mix in accordance with this concept SSDA and ongoing engagement in accordance with <b>Section 8.3</b> of this EIS will be a key determinant of the future social wellbeing of the renewed locality.	Very high positive
<b>Accessibility</b>			
Enhances accessibility and connectivity to jobs and services for local communities via Waterloo Metro station	Medium positive	The site's proximity to the metro places future residents within easy reach of employment opportunities and services. Through implementing the recommendations of Section 7.2.3.1 of the SIA, including implementing the mitigation measures established in the TIA ( <b>Appendix CC</b> ) the social outcome is expected to be improved.	High positive
Improved accessibility throughout the site through concept design	Low negative	The existing population have mobility challenges, and the physical condition of the estate is declining. Committing to urban design approaches for improved accessibility throughout future detailed applications is likely to improve the social impact in this category.	Medium positive
Access to social infrastructure and services for future communities	Low negative	The lack of adequate on-site social infrastructure within Waterloo South, together with the high proportion of residents who require or have expressed a need for improved provision, limits accessibility for the existing community. Enhancement strategies are proposed to form part of future detailed applications as illustrated in Section 7.2.3.3 of the SIA. The types of social infrastructure could include but is not limited to: <ul style="list-style-type: none"> <li>a skills exchange and redeployment centre, a social enterprise hub, early education, and childcare.</li> </ul> Community use floorspace will be delivered in accordance with the VPA and the indicative staging as outlined in <b>Section 6.4</b> of this EIS.	Very high positive
<b>Culture</b>			
Recognition and celebration of local First Nations culture through project design and delivery	High negative	As Waterloo South comprises a significant Aboriginal community, the proposal could result in a sense of loss, in terms of being a place that has held intergenerational memories for families. Designing with Country (DWC) and Connecting with Country (CWC) has been embedded into the concept SSDA to improve the recognition of First Nations culture through the project delivery. See section 7.2.4.1 of the SIA for further detail.	High positive
Recognition and respect for the historical and cultural significance of	High positive	Stockland, along with Homes NSW have been actively engaging with existing tenants to inform the concept SSDA and will continue to engage with tenants during the detailed design stage.	High positive

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
the Waterloo Estate and surrounding area through the renewal process		<p>Recognition and respect for the historical and cultural significance of the Waterloo Estate and its surrounding area will be embedded in the renewal process. The Estate is a place of recognised cultural significance for Aboriginal communities, and this importance will inform design, engagement and delivery across the project.</p> <p>Future detailed application stages will be underpinned by the CWC and DWC frameworks which will ensure engagement with existing tenants informs the future design stages of the proposal. Refer to section 7.2.5.1 of the SIA for further detail. The Public Art strategy also provides an opportunity to curate a strong sense of place through the renewal by reflecting Waterloo's rich history.</p>	
<b>Health and wellbeing</b>			
Delivering a safer, more liveable environment for current and future communities	Medium positive	<ul style="list-style-type: none"> <li>The proposal responds to Waterloo South's growing need for activation and diversification. The following strategies will be implemented at detailed design stage to contribute to achieving high positive impacts: The delivery of inclusive and active streetscapes, retail spaces, activity nodes, and Apartments designed to achieve ADG objectives and, where possible, ADG design criteria and guidelines.</li> <li>A commitment to achieving the sustainability commitments will be maintained throughout development.</li> <li>Implement the findings of the CPTED Report prepared by Urbis.</li> </ul>	Very high positive
Improving social wellbeing in the local area through the renewal of the estate	Low positive	<p>The concept proposal adopts a holistic approach that provides opportunities to enhance social wellbeing. To improve the outcome for this category, it is proposed to:</p> <ul style="list-style-type: none"> <li>Implement the Sustainability commitments outlined in <b>Section 6.5.8</b> of the EIS.</li> <li>Enable ongoing coordination and collaboration between development partners and local social and health services networks to support residents through relocations processes.</li> <li>Embed health and wellbeing outcomes to support ageing in place.</li> </ul>	High positive
Wellbeing impacts for the local community of the construction process and timelines	High negative	<p>Given the number of sensitive receivers in proximity to the proposal site, the vulnerability of local population groups, and the anticipated duration of construction, the impacts on health, wellbeing and daily life are anticipated to be of a negative impact. The following mitigation strategy is proposed to improve the wellbeing impacts resulting from the construction process:</p> <ul style="list-style-type: none"> <li>Future detailed applications will commit to the measures identified as part of the Construction Environmental Management Plans to be delivered through future design stages.</li> </ul>	Medium positive
Wellbeing impacts for tenants associated with changes to the estate and relocation processes	High negative	<p>The renewal process will bring significant changes to the lives of existing tenants, as a result of the anticipated timeframe for completion of all stages, as well as necessary relocations during this time. The mitigation measure outlined in Section 7.2.2.2 of the SIA are to be implemented, including:</p> <ul style="list-style-type: none"> <li>The recommendations of the Waterloo South People and Place Plan.</li> <li>The relocation process will be undertaken with consideration of the Relocation and Support Guide (Homes NSW)</li> <li>Frequent and timely updates will be provided to the community.</li> </ul>	Low negative
Support for future community wellbeing through access to social infrastructure	Medium positive	<p>The relocation of current tenants will cause disruption to accessing services and infrastructure that exist within the site.</p> <p>Providing new, dedicated onsite community uses will strengthen the incoming resident and tenant cohort creating new opportunities to improve health and wellbeing. Opportunities to reinstate existing service providers during the renewal will also achieve positive social outcomes for future residents.</p>	Medium positive

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
and community services on-site		Given the details relating to the specific types of social infrastructure to be delivered will not be known until detailed planning commences for each stage, this commitment will be carried forward through all detailed design phases.	
Improved safety through Crime Prevention Through Environmental Design approach to project design and delivery	High negative	<p>The crime profile confirms that the Waterloo South Renewal site sits within a localised crime hotspot, with higher-than-average rates for several offence types compared to NSW. Community consultation has reinforced that safety and security within the estate remain critical concerns, particularly in relation to interactions between tenants and the wider community. To improve safety outcomes for the project, the following enhancement strategies are proposed:</p> <ul style="list-style-type: none"> <li>• Implement CPTED recommendations across the project lifecycle as outlined in the CPTED Report prepared by Urbis attached as <b>Appendix K</b>.</li> <li>• Deliver culturally safe and appropriate outcomes for Aboriginal community members</li> <li>• CHPs to collaborate with specialist service providers and community organisations to ensure that residents experiencing domestic or family violence have timely access to assistance, safe accommodation options, and ongoing support, given relatively high rates in the local area.</li> </ul>	Medium positive
<b>Surroundings</b>			
Concept design to improve visual amenity	Low positive	<p>The proposal aligns with the area's evolving character and the desire for increased visual amenity in the suburb. The visual impacts associated with the proposal have been addressed in detail in the Visual Impact Assessment prepared by Urbis and attached as <b>Appendix P</b> as well as within this EIS. At the concept stage, mitigation of visual impacts is primarily achieved through the overall precinct structure. Further mitigation measures should be considered at detailed design stage.</p> <p>Visual amenity will also be improved through the provisioning of public art as is described in the Preliminary Public Art Plan prepared by UAP and attached as <b>Appendix L</b>.</p>	Medium positive
Concept design to enhance sunlight access to dwellings and improved public domain	Medium positive	<p>Access to sunlight creates healthy, comfortable and liveable environments, and was raised by existing tenants as an area lacking in their existing housing.</p> <ul style="list-style-type: none"> <li>• The revised building envelopes proposed in this SSSA enhance the solar access to public domain areas and private communal spaces as described in <b>Section 9.4</b>.</li> <li>• The reference scheme demonstrates that an appropriate level of solar access can be achieved to future residential dwellings as outlined in <b>Section 9.5</b> of the EIS.</li> <li>• There are opportunities to further enhance solar access at detailed application stage.</li> </ul>	Medium positive
Protection of public safety and security during construction process	High negative	Construction activities can intensify needs and place additional strain on wellbeing of residents. Furthermore, under previous constructions within the locality, residents have experienced safety and security issues. Strategies to improve public safety during construction will be included as part of Construction Management Plans that will support future detailed applications.	Medium negative

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
<b>Livelihoods</b>			
Creation of education, employment opportunities and training pathways	Medium positive	<p>Education opportunities created through the project are an important focus for improving social wellbeing over time. The social impact without mitigation is derived from the unknown level of commitment and targets to creating jobs and training pathways as part of the proposal. Enhancement strategies to be implemented during the detailed design stages include:</p> <ul style="list-style-type: none"> <li>• Commit to creating pathways into education and employment opportunities in Waterloo South.</li> <li>• As part of later, more detailed stages of the SSDA application process, Stockland and Homes NSW will identify specific targets and strategies to create local jobs and training pathways as part of the Waterloo South Redevelopment.</li> </ul>	High positive
Increased opportunities for local businesses and workers	Low positive	<p>While local procurement arrangements during construction are not yet defined, the proposal's commitment to retail, supermarket, food and beverage, and other commercial uses presents opportunities to support local businesses and employment. To ensure the proposal improves the outcome in this category, the following strategies are proposed:</p> <ul style="list-style-type: none"> <li>• Engagement with local retailers and other businesses as part of planning the non-residential uses on site.</li> <li>• A retail demand assessment has been undertaken by Urbis which quantifies the retail demand for the precinct. This report has been submitted with the concurrent Rezoning Proposal.</li> <li>• Continue engagement with current and future residents to determine preferences for retail and services required within the community.</li> </ul>	High positive
Improved livelihoods for local communities through social and economic renewal	High negative	<p>The current community is characterised by high socio-economic disadvantage. The proposed mix of social, affordable and market housing is expected to enhance the social outcome for this category. Refer to Section 7.2.7.3 of the SIA for further detail.</p>	Very high positive
<b>Decision-making systems</b>			
Opportunities for community members to engage in decision-making throughout the project lifecycle	High negative	<p>A broad range of engagement has been undertaken during the pre-lodgement phase of the development, in addition to previous engagement undertaken by NSW Government (see Engagement Outcomes Report in <b>Appendix M</b>). Mitigation measures are recommended to improve the outcome for this category, as detailed in Section 7.2.8.1 of the SIA including clearly demonstrating how stakeholder and community feedback influences decision making.</p>	High positive
Engaging with First Nations community members through project design and delivery	High positive	<p>The existing commitment by the applicant to engage with local Aboriginal community members to inform decision making processes represents a positive social impact that should be continued into the future. Engagement is proposed to continue as outlined in <b>Section 8.3</b>, and mitigation strategies are to be implemented throughout the lifecycle of the project to improve outcomes for this category as per Section 7.2.8.2 of the SIA. The project will commit to the Homes NSW People and Place Plan actions to facilitate appropriate engagement with First Nations community members as well as fulfil the approach to engagement identified in the Stockland Aboriginal Engagement Strategy. As part of future applications, continue to engage Nguluway Design Inc and Ngurra Advisory (or similar) throughout the design to inform the DWC and CWC frameworks.</p>	High positive

Category	Social Impact without mitigation	Existing Context and Mitigation / Enhancement Strategies	Social Impact post implementation of mitigation measures
Engaging with harder to reach communities through project design and delivery	High negative	Given that many people have lower English levels, long term health concerns, and may otherwise have low levels of trust in Government, potential for community members to continue to not participate in engagement regarding the proposal remains high. Community engagement is proposed to continue in a manner that ensures communication meets the needs of diverse and vulnerable communities and in accordance with <b>Section 8.3</b> of this EIS and the Engagement Outcomes Report ( <b>Appendix M</b> ).	Medium positive

The SIA also assesses cumulative impacts arising from the proposal, including the physical, social and economic transformation of the local area, increased housing supply and diversity in the inner-city area, construction fatigue and associated wellbeing impacts as well as consultation fatigue. The SIA concludes that, with appropriate mitigation strategies applied to each area, these cumulative social impacts can be managed to a reasonable extent.

As summarised in **Table 34**, the SIA concludes that the proposal will result in an overall positive social impact, with most identified negative impacts capable of being mitigated or improved through the implementation of targeted mitigation and enhancement measures.

## 9.20 Accessibility

An Access Design Review has been undertaken by Jensen Hughes (**Appendix HH**) to assess the concept against the Principles of Universal Design, the Objects of the *Disability Discrimination Act 1992*, the Disability (Access to Premises-Buildings) Standards 2010, Part D4 and Clauses E3D7 and F4D5 of the Building Code of Australia 2022 Amendment 2 (BCA2022) Volume 1 and Applicable Australian Standards.

The design review includes items such as accessways, building entrances, provision of vertical transport, doors, stairs, ramps and walkway requirements, car parking, sanitary facilities, landscaping and adaptable housing provisions. Subject to addressing actions identified within the report for future detailed design stages of the project, the review confirms that the development provides accessibility capable of complying with the relevant provisions.

In addition to the review addressing the abovementioned relevant policies, it also undertakes an assessment of the proposal against the relevant provisions of the 2022 Design Guide and amendments proposed as part of the Rezoning Proposal. The concurrent Rezoning Proposal includes amendments to the liveable housing requirements proposed to be amended in the Design Guide. In accordance with the Design Guide, as proposed to be amended, the reference scheme has given consideration to achieving the following requirements, to be detailed in future detailed applications:

- 85 per cent of social housing Class 2 dwellings (apartments) will achieve silver standards of the Liveable Housing Design Guidelines
- 15 per cent of social housing Class 2 dwellings (apartments) will achieve gold standards of the Liveable Housing Design Guidelines
- 20 per cent of affordable housing and market housing Class 2 dwellings (apartments) will achieve silver standards of the Liveable Housing Design Guidelines

Subject to addressing the actions identified as necessary within the future design stages of the project, Jensen Hughes confirm that the project documentation provides accessibility capable of complying with the Disability (Access to Premises – Buildings) Standards 2010 (APS), National Construction Code (BCA) and Sydney DCP 2012 and the Design Guide, as proposed to be amended.

The concept demonstrates that future detailed applications are capable of achieving the spatial requirements to provide access for people with a disability under the relevant standards and codes. Future detailed applications will be accompanied by an accessibility assessment, prior to the issuance of a construction certificate, to ensure internal fit-outs, details for stairs, ramps, finishes, amenities and other features comply with the relevant standards.

# 10.0 Project Justification

Considering the assessment of impacts above, this section provides an overarching justification and evaluation for the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

## 10.1 Project Design

This application seeks development consent for a concept development for the redevelopment of Waterloo South. The concept SSDA does not seek consent for any physical works on the site, but it establishes the key planning, design and development principles and considerations that will inform future and separate applications that will seek consent for the construction of new development on the site. Once the concept SSDA is determined, future applications will be assessed against their consistency with the concept SSDA. Specifically, the concept SSDA seeks to establish the following across the site:

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

Further detail on the proposed development is provided in **Section 6.0** of this report, and in the Design Report, prepared by SJB at **Appendix F**.

## 10.2 Strategic Justification

As detailed within **Section 4.0 above** of this EIS, the proposal is directly aligned with the relevant strategic planning framework, as summarised below:

- **Housing Supply:** The proposed development addresses various strategic frameworks provided by the federal, state and local governments by contributing to the increase in supply of housing within the City of Sydney LGA and NSW. This proposal acknowledges these strategic frameworks' urgency for diverse and affordable housing and will alleviate housing stress within Sydney and the broader community.
- **Housing Diversity:** The Waterloo South renewal will deliver a range of housing typologies and tenure types, including social, affordable, and market housing, aiming to achieve an inclusive community. The precinct's design considers the needs of different household types, including families, single-person households, and older residents. Accessible and adaptable housing will also be incorporated, ensuring that housing supply meets changing demographic and social needs over time.
- **Liveability:** The project will enhance and improve the liveability of Waterloo South as it has been driven by placemaking principles that enhance the character, identity, and functionality of the precinct. High-quality public domain upgrades, new parks, improved streetscapes, and active transport connections will contribute to a more vibrant and liveable urban environment. The project identifies the proposed location for new public spaces, cultural facilities, and recreational amenities that will foster social interaction and community engagement resulting in improved liveability in Waterloo South.
- **Economic Prosperity:** The proposed development retains a significant portion of non-residential floor space, including approximately 10,000m<sup>2</sup> non-residential GFA that aligns with the retail demand anticipated for the area, and a minimum 5,000m<sup>2</sup> community related floor space across the precinct. The proposed proportion of non-residential floor space across the precinct optimises residential yield, particularly for social and affordable housing, while still delivering a diverse and active non-residential offer that supports local needs and contributes to the overall vibrancy of Waterloo South.

## 10.3 Statutory Justification

A detailed assessment against the statutory planning context of the proposed development is provided in **Section 0** of this EIS, which confirms that the proposed development is permissible with consent and complies the relevant statutory requirements of the Sydney LEP 2012 as is proposed to be amended via the concurrent Rezoning Proposal, and other relevant environmental planning instruments.

## 10.4 Community Views

This proposal has been subject to significant engagement with key government agencies including the DPHI, Homes NSW, City of Sydney Council, TfNSW, Aboriginal Stakeholders, (including Gadigal Traditional Owners, Aboriginal Community Controlled Organisations and Waterloo Aboriginal Housing Tenants), the local community (including but not limited to existing tenants) and utilities and service providers. The detail of this engagement is provided within the Engagement Report provided at **Appendix M** and **Section 8.0** of this report. In summary, the consistent feedback received during the consultation was in relation to:

- Tenure blind outcomes and dwelling mix, including social and affordable housing
- Built form and amenity impacts including privacy, overlooking, overshadowing, wind, noise and edge conditions to neighbouring properties
- Precinct layout, pedestrian connectivity and walkability, and reduced vehicle dominance
- Open space provision, community facilities and socio-cultural spaces
- Infrastructure services including transport and health facilities

The proposed development has considered the feedback received, which has informed the design iteration throughout the course of the project.

## 10.5 Likely Impacts

In accordance with the SEARs, the EIS has undertaken a detailed assessment of the scale and nature of the likely environmental, social and economic impacts of the proposed development, including cumulative impacts.

### Environmental Impacts

The EIS has considered all potential environmental impacts of the proposed development, including:

- Built Form and Urban Design
- Solar Access and Overshadowing
- Visual Impacts
- Wind Impacts
- Residential Amenity
- Public Domain and Landscaping
- Crime Prevention Through Environmental Design
- Contamination and Remediation
- Biodiversity and Tree Removal
- Aboriginal Cultural Heritage
- Built and Archaeological Heritage
- Infrastructure and Staging
- Water Management and Flooding
- Traffic and Transport
- Noise and Vibration
- Aviation
- Waste Management
- Accessibility

The assessment concludes that the proposed development will not result in any unacceptable impacts and where any adverse impacts are proposed, these can be managed through appropriate mitigation measures which are summarised in **Appendix C**.

## Social Impacts

Social impacts have been assessed in detail in **Section 9.19** of this report. There are a number of positive social impacts and benefits of the proposed development including:

- The proposal will deliver approximately 3,300 new dwellings, significantly boosting the housing supply within inner Sydney and supporting State and Commonwealth housing objectives.
- A diverse mix of housing tenures is proposed, including social housing (minimum 30 per cent of residential GFA), affordable housing (approximately 20 per cent of residential GFA, 7 per cent to be delivered in perpetuity with any additional affordable provided for a minimum period of 25 years) and market housing (up to 50 per cent of residential GFA), promoting housing diversity and social inclusion. Of this provision, 20 per cent of social housing GFA and 15 per cent of affordable housing GFA will be prioritised for Aboriginal residents, supporting culturally appropriate housing outcomes.
- The development will improve access to employment opportunities, services, facilities, including community infrastructure, and non residential uses, supporting everyday needs and enhancing liveability for residents.
- Significant improvements to the public domain will be delivered, including enhanced streets, pedestrian environments and the provision of high-quality publicly accessible open spaces that support recreation, social interaction and community wellbeing.
- The proposal will deliver culturally safe outcomes for Aboriginal communities, informed by Designing with Country principles and ongoing engagement, ensuring that cultural identity, connection to Country and community presence are recognised and embedded within the precinct.
- High-quality architecture, landscape and public domain design will improve visual amenity and contribute positively to the character of Waterloo South and the surrounding area.
- The development adopts a tenure-blind design approach across all residential buildings, ensuring that dwellings of different tenure types achieve comparable standards of quality, amenity, and appearance. This approach supports an inclusive environment and avoids the visual or physical distinction between tenure types.

## Economic Impacts

A summary of the economic impacts of the proposed development is provided below:

- The development will generate approximately 1,999 FTE construction jobs during the delivery phase;
- The project will create significant ongoing operational jobs once all stages are complete, including jobs related to the community related uses and other non-residential uses such as retail premises.
- The proposal supports the delivery of a minimum of 15,000m<sup>2</sup> of non-residential uses including approximately 10,000m<sup>2</sup> non-residential GFA (market-facing uses such as retail, services and other employment-generating uses) plus a minimum 5,000m<sup>2</sup> community related GFA. This split ensures community infrastructure is explicitly secured while aligning the market-facing component with evidence of demand.
- Urbis' Retail Market Demand Assessment which was prepared to support the Rezoning Proposal identifies demand for approximately 8,600–9,340m<sup>2</sup> of combined retail and commercial non-retail floorspace within Waterloo South. The provision of non-residential floorspace is broadly consistent with the demand-supported quantum, supporting a local-serving centre role and activation without compelling delivery of excessive market-facing floorspace. The additional 2,000m<sup>2</sup> retail demand identified beyond 2036 lends to the provision of approximately 10,000m<sup>2</sup> across the precinct fulfilling the retail demand.
- The proposal will support and enhance the function of Waterloo South, contributing to the renewal of the existing social housing and providing a diverse dwelling mix that is well supported by new and existing infrastructure.

## 10.6 Principles of Ecologically Sustainable Development

The EP&A Regulation lists four key principles of ESD which must be considered in assessing a project. **Table 35** below provides an assessment of the proposal's impact against these principles. The assessment is informed by the ESD Report prepared by WSP, included in this EIS as **Appendix FF**.

**Table 35** Assessment against ecologically sustainable development principles

Principle of ESD	Assessment
<b>The Precautionary Principle</b>	A detailed assessment of the environmental impacts of the concept SSDA has been undertaken to identify potential risks and provide relevant mitigation measures (refer to <b>Appendix C</b> ). The proposed development integrates a range of environmental management strategies, including the delivery of local ecological species, ongoing consultation with the local Aboriginal knowledge holders, and climate change resilience initiatives. By implementing these elements, it highlights the project's commitment to planning for and mitigating potential future and uncertain environmental impacts.
<b>Intergenerational Equity</b>	The proposal has been designed to benefit existing and future generations by: <ul style="list-style-type: none"> <li>• Creating a basis for which the heritage buildings can be refurbished and reused, allowing the overall site to be repurposed and used for future generations.</li> <li>• Incorporating a range of sustainability measures into the masterplan, to reduce the site's energy and water consumption, and waste and greenhouse gas production.</li> <li>• Mitigation measures have been provided to protect the built and natural environment.</li> <li>• The proposal has considered short and long-term social, financial and environmental considerations to ensure issues do not need to be addressed by future generations.</li> </ul>
<b>Conservation of Biological Diversity and Ecological Integrity</b>	The proposed development will conserve biodiversity and ecological integrity through the incorporation of native vegetation, supporting local ecosystems and enhancing local biodiversity. Ecological integrity will be further maintained through the implementation of complementary management measures, including reduced carbon emissions and water-efficient practices, and consultation with Aboriginal stakeholders to ensure the protection and respectful consideration of Aboriginal cultural and environmental values. These measures will minimise environmental impacts, improve resource efficiency, and contribute to long-term ecological sustainability and the protection of biological diversity.
<b>Improved Valuation, Pricing and Incentive Mechanisms</b>	The development embraces sustainability in both its design and ongoing operation, recognising the economic and social value of natural resources. Through the careful selection of materials and equipment, the proposal prioritises operational efficiency. The development will incorporate energy-efficient and low-carbon materials, together with water-efficiency and thermal comfort strategies, to enhance environmental performance and reduce ongoing operational costs.

## 10.7 Public Interest

The proposal will deliver significant public benefit that aligns with the public interest through the following outcomes:

- The proposal will renew and expand the existing social housing stock, which is approaching the end of its functional life, and replace it with high-quality contemporary housing supported by integrated amenities, landscaping and communal facilities. The redevelopment of Waterloo South presents a substantial opportunity to revitalise the precinct and significantly improve living conditions and amenity for both existing and future residents.
- The project will deliver high-quality mixed-tenure housing within a rapidly transforming inner-city area, including substantial social and affordable housing components. This will increase housing choice, promote social diversity and make a meaningful contribution to addressing the ongoing housing crisis.
- The proposal has the potential to generate significant social and economic benefits for the local community and Greater Sydney by delivering a diverse mix of land uses that support housing supply, employment generation, community services and educational opportunities.
- The development will deliver significant public domain improvements, including new and upgraded roads, road widenings, enhanced pedestrian infrastructure, improved streetscapes and the provision of publicly accessible open spaces that support community use and precinct-wide activation.
- The project will create employment opportunities during both the construction and operational phases, stimulating the local economy and contributing to sustained economic activity and growth.

The proposal establishes an authentic mixed-use precinct, integrating housing with essential services, community facilities and high-quality public transport access, supporting a connected, inclusive and resilient urban neighbourhood.

## 10.8 Suitability of the Site

The site is suitable for the proposed development for the following reasons:

- The site is strategically located in close proximity to high-capacity public transport infrastructure, including the Waterloo metro station, as well as existing bus, walking and cycling networks. This level of accessibility is capable of supporting the proposed increase in population and will not result in any adverse or significant impacts on surrounding development or land uses.
- The proposal represents an efficient and orderly use of underutilised government-owned land, enabling a substantial increase in housing supply within Waterloo South. Failure to redevelop the site would represent a missed opportunity to optimise the use of a large, strategically located inner-city site in accordance with State and Commonwealth housing objectives.
- The concept SSDA recognises and responds to the cultural and heritage significance of the site, including through the incorporation of Designing with Country principles. Indigenous knowledge and narratives will be embedded throughout the precinct via the public domain, landscape strategy and future detailed design stages.
- The site has excellent access to a wide range of existing services and facilities, including education, health, open space, retail and employment opportunities, which will support the future community and benefit from increased activity generated by the redevelopment.
- The development has been designed to minimise impacts on surrounding properties and, in several respects, will improve the natural, historical and environmental qualities of the site through enhanced public domain, landscaping, environmental performance and place-based design.
- The proposal is expected to result in only minor environmental impacts, all of which can be appropriately managed and mitigated through the measures identified in this EIS and implemented at subsequent stages of development.
- The site is subject to the Sydney LEP 2012 and is zoned E1 Local Centre, MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure. These zones permit a broad range of land uses and are appropriate to support the proposed mixed-use redevelopment.
- The site is well serviced by existing utility infrastructure, including water, wastewater, electricity and telecommunications, with capacity available or capable of being augmented to meet the servicing requirements of the proposed mixed-use precinct.
- The size of the site enables a coordinated master planned approach, with land uses appropriately distributed to ensure diversity, integration and high-quality public domain and infrastructure outcomes.

# 11.0 Conclusion

This EIS has been prepared to consider the environmental, social and economic impacts of the concept development for the proposed Waterloo South renewal project. This EIS has addressed the issues outlined in the SEARs Compliance Table (**Appendix B**) and is in accordance with Schedule 2 of the EP&A Regulations with regard to consideration of relevant matters.

To ensure transparency and consistency, the State Assessed Rezoning Proposal and this EIS are intended to be publicly exhibited concurrently, demonstrating alignment between the built form and the emerging statutory framework.

The EIS has considered a range of issues including statutory and strategic context, suitability of the site, community and stakeholder engagement, traffic and transport, soils and water, urban design and visual impacts, noise and vibration, infrastructure requirements, Aboriginal cultural heritage, non-Aboriginal cultural heritage and archaeology, biodiversity, socio-economic impacts, ecologically sustainable development, waste and contamination.

Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of this project is justified for the following reasons:

- The concept SSDA is consistent with relevant Commonwealth, State and local strategic policies and plans, and facilitates the renewal of Waterloo South as a well-located, mixed-use precinct delivering a substantial increase in residential accommodation, including social and affordable housing.
- The proposed development has been designed with regard to the site's unique physical, social and urban context, ensuring that an appropriate form, scale and distribution of built form is achieved across the precinct, with sensitive transitions to surrounding development.
- The proposal directly supports the objectives of the Australian Government's National Housing Accord (2023) by facilitating the delivery of approximately 3,300 well-located dwellings within an accessible, infrastructure-rich inner-city location during the Accord period (2024–2029), including a minimum of 30 per cent social housing, approximately 20 per cent affordable housing and up to 50 per cent market housing (measured as a proportion of residential GFA), thereby making a substantial contribution to State and national housing supply targets.
- The built form and development outcomes established by the concept SSDA are consistent with the proposed statutory framework being progressed through the concurrent State Assessed Rezoning Proposal, providing a clear, coordinated and robust planning framework for future stages of development.
- The proposal accommodates a diverse mix of residential and non-residential land uses appropriate to the site, including retail, non residential uses and commercial uses, which together will support the needs of the future community and surrounding neighbourhoods.
- All residential development facilitated by the concept SSDA will be capable of achieving a high level of residential amenity consistent with the objectives of the ADG and the proposed Design Guide update.
- The project will not result in any unreasonable adverse environmental impacts that cannot be appropriately managed through the mitigation measures identified in this EIS and implemented at subsequent stages of development.
- The precinct will incorporate publicly accessible open spaces and essential services that are integrated with development, contributing to a connected, inclusive and high-quality public domain.
- The concept SSDA establishes a clear framework to guide the long-term, staged redevelopment of the site over an anticipated period of approximately 10 to 15 years, defining building envelopes, indicative land use distribution and yields, public domain outcomes and infrastructure delivery parameters to inform future detailed development applications.

Given the merits described above, it is requested that the application is approved.