



Waterloo Metro Quarter – Integrated Submission covering
Central Precinct (SSD-79307746) Northern Precinct (SSD-79307758)
Second Amending Concept (SSD-79307765)
Basement Modification 3 (SSD-10438-Mod-3)

Counterpoint Community Services Inc
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1. Opening Statement

Counterpoint welcomes the commitment to housing diversity and transit-oriented development at the Waterloo Metro Quarter (WMQ). We acknowledge improvements over earlier proposals, including enhanced public-domain connections, sustainability measures, and design refinements. We champion housing choice as a principle; however, choice must not come at the expense of equity. The current suite of applications prioritises co-living/student accommodation and market housing while delivering no public housing within the Central Precinct. This is a missed opportunity to address urgent housing needs and to integrate planning across Waterloo. Without binding conditions on social infrastructure, governance, amenity (including overshadowing and wind), acoustic/vibration controls, and construction management, the WMQ risks deepening disadvantage rather than creating shared value.

While we strongly applaud the inclusion of Social Impact Statements in the exhibited material, we are highly critical of its depth, methodology, and standard.

This raises serious concerns about the adequacy of social impact assessments not only for this development but also for neighbouring projects in Waterloo, where cumulative impacts on vulnerable communities' demand far more rigorous analysis and transparency.

If the developers had worked in an equitable, consistent, and meaningful way with their own established steering group—embracing true co-design principles—many of the objections raised in this submission, and indeed across the wider community, could have been avoided.

Additional for the department of planning on Exhibition accessibility: Running four concurrent exhibitions at one site across a holiday window is neither accessible nor democratic for predominantly public-housing communities. Future practice should consolidate documentation, extend timeframes, and fund on-the-ground engagement to support genuine participation.

2. About Counterpoint Community Services Inc

Counterpoint Community Services Inc. provides a wide range of community support services in the Inner City and South East Sydney LGAs. We have operated in the heart of Waterloo since 1977, with a particular focus on working with social housing tenants and diverse communities. We operate The Factory Community Centre in Waterloo, Counterpoint Multicultural Centre in Alexandria, Poet's Corner Pre-school in Redfern and act as the lead agency for many local grassroots groups and services.

Counterpoint leads the Redfern and Waterloo Groundswell coalition, a network of local and peak-body NGOs working together to resource and support residents through the Waterloo Estate redevelopment process. We also serve as co-chair of the Waterloo Human Services Collaborative and the Waterloo NAB redevelopment group, are active members of REDWatch, and host the independent Community Development Worker, funded by the City of Sydney and Homes NSW.

We support the submissions from our partner member organisations and networks above.

The views expressed in this submission reflect both diverse community perspectives and our professional assessment. Not all comments contained herein necessarily represent the formal position of Counterpoint in every respect.

We strive to remain as impartial and evidence-based as possible; support community views in their diversity being heard; our funding arrangements do not influence the positions outlined here; and we are an apolitical organisation.

3. Exhibition Snapshot – What is on Exhibition

Four related applications are on public exhibition (27 November 2025 – 15 January 2026):

- **Northern Precinct (SSD-79307758):** Amending detailed SSD for two residential towers above a mixed-use podium; document sets include Notice, SEARs, EIS (~43 docs), Agency Advice (5).
- **Central Precinct (SSD-79307746):** Amending detailed SSD for a 24-storey co-living/student accommodation tower with podium retail and childcare; document sets include Notice, SEARs, EIS (~45 docs), Agency Advice (5).
- **Second Amending Concept (SSD-79307765):** Amends building envelopes and land uses for Northern and Central Precincts, maintaining overall GFA and redistributing uses toward residential and co-living; document sets include Notice, Requests for SEARs (2), SEARs, EIS (~32 docs), Agency Advice (5).
- **Basement Modification 3 (SSD-10438-Mod-3):** Modifies the approved basement layout and services (OSD tank footprint, internal replanning, structure and piling changes); document sets include Notice and Modification Application (19 files).

4. Strategic and Concept Issues (SSD-79307765)

We support the intent to align WMQ land uses with contemporary housing needs; however, the Second Amending Concept must demonstrate:

- Consistency with the endorsed Concept DA (SSD-9393) and the Waterloo Design & Amenity Guidelines, including design excellence pathways and measurable social outcomes (not only aesthetics).
- Transparent cumulative impact assessment across precincts (traffic/servicing, overshadowing/solar access to parks and streets, wind safety, reflectivity/glare, acoustic/vibration, waste and utilities).
- Explicit integration with Homes NSW's Waterloo South planning and delivery, to avoid fragmented infrastructure and governance and to address concentrated disadvantage adjacent to WMQ.
- Connecting with Country principles embedded beyond landscaping—into governance, programming, and cultural safety for Aboriginal tenants and communities.

Requested conditions (Concept level): (i) require a Waterloo-wide Social Infrastructure and Governance Plan before determination; (ii) require a Design Excellence strategy that includes measurable social outcomes; (iii) require formal integration mechanisms with Homes NSW for shared facilities and programming; and (iv) require cumulative overshadowing and wind testing across the whole precinct, not parcel-by-parcel.

5. Northern Precinct (SSD-79307758) – Key Community Issues and Requests

We acknowledge the shift from an office tower to two residential towers (approx. 314 apartments, including an affordable housing component). While increased housing supply near transit is supported, conditions are required to ensure social outcomes and public realm quality:

- Affordable housing in perpetuity: secure via a registered covenant or planning agreement; independent/government oversight (e.g., Homes NSW); transparent compliance reporting; eligibility pathways prioritising households affected by Waterloo Estate renewal.
- Overshadowing and wind: require seasonal solar access modelling and detailed pedestrian-level wind assessment for Cope Street Plaza, Raglan Walk, and Botany Road frontages; apply design changes (setbacks, podium articulation, tower shaping) where needed to protect amenity beyond minimum compliance.
- Acoustic/vibration: adopt EPA-aligned rail vibration and ground-borne noise limits and require mitigation design to protect residential amenity and podium uses.
- Construction staging and interface with the operating station: require robust Construction Environmental Management Plans (CEMPs), OOHW controls, transparent community notifications, and a Community Oversight Panel linking WMQ works to station operations.

Requested conditions (Northern): (i) Affordable Housing Management Plan with binding in-perpetuity targets and governance; (ii) Overshadowing/wind mitigation designs and post-approval validation; (iii) Acoustic/vibration criteria adoption and certification at detailed design; (iv) Construction staging plan with community oversight and OOHW limits.

6. Central Precinct (SSD-79307746) – Community Advocacy with Technical Basis

Counterpoint supports housing diversity but objects to the absence of public housing in the Central Precinct and the dilution of community profile within the social impact analysis. The EIS and Social Impact Assessment (SIA) rely on precinct-level averages that mask concentrated disadvantage among social housing tenants immediately adjacent to WMQ. We seek binding conditions that align co-living/student accommodation with genuine community benefit.

6.0A Social Impact Assessment – Methodology and Scope

The SIA leans on aggregated ABS statistics across a broad set of small areas. By blending some of the most advantaged blocks with the most disadvantaged public-housing blocks next to WMQ, the analysis produces “average” outcomes that obscure impacts on households with the least capacity to absorb change. A credible SIA must disaggregate to street- and block-level, interrogate service usage and waiting lists, and assess cumulative effects across the four concurrent DAs—not just parcel by parcel.

Requested condition: Require a peer-reviewed SIA Addendum with disaggregated local data and cumulative impact testing across Northern, Central, Concept and Basement, published before consent.

6.1 Public Housing Priority and Housing Mix

While co-living adds diversity, Waterloo requires public and genuinely affordable housing integrated with transit benefits. The Central Precinct is a logical location for public or temporary accommodation during Waterloo Estate renewal, avoiding costly displacement and maintaining social networks. The absence of public housing here undermines social mix commitments.

Requested conditions: (i) minimum public housing or temporary accommodation allocation within WMQ, or equivalent funded contribution to Homes NSW; (ii) affordable student/co-living pricing caps linked to local incomes; (iii) independent management and complaints framework co-designed with local organisations.

6.2 Social Infrastructure – Plan, Facilities, and Access

There is no Waterloo-wide social infrastructure plan enabling cumulative assessment. The EIS does not correctly identify existing facilities and providers (including Counterpoint's community centre within a short walk), nor their capacity constraints and conditions. Childcare does not replace a suitable multi-purpose community hub that offers programs, advocacy, cultural activities, and support.

The community facilities mapping contains material inaccuracies and omissions. Key Aboriginal organisations are mis-located; The Factory Community Centre and Counterpoint Multicultural Services are not adequately accounted for. Decisions about new facilities should be based on verified on-site inventory and a building-suitability audit (fit-for-purpose, accessibility, and lease security), not a desk review.

The childcare analysis is also factually incorrect and methodologically weak, asserting that there is no childcare within 400 m when multiple centres are within short walking distance. The assessment does not measure capacity, waiting lists, affordability, or the difference between commercial models and trusted local providers. Approving a new commercial centre without a needs test risks crowding out community providers and lifting fees.

Requested conditions: (i) prepare a Waterloo-wide Social Infrastructure Plan before determination; (ii) deliver a genuine multi-purpose community centre (e.g., in Waterloo South's future park, centrally located); (iii) undertake a Childcare Needs Assessment (inventory, capacity, affordability, waiting lists, access barriers, provider typology) before consent; (iv) apply fee caps and priority access for vulnerable families; (v) preference trusted local providers to operate the centre under social outcome KPIs; (vi) indexed contributions to upgrade existing facilities managed by trusted providers.

6.3 Agency Coordination and Governance

We note no Homes NSW advice visible in the exhibition material, despite an estate-wide renewal opposite the site. There is a lack of integration between WMQ and Waterloo South planning, which risks fragmented outcomes. Existing co-governance bodies (e.g., Waterloo Human Services Collaborative) and the developer's panel were not engaged meaningfully. Survey response rates are low relative to the catchment.

Requested conditions: (i) require formal integration with Homes NSW planning (shared facilities, program governance, and funding); (ii) establish a Community Oversight Panel with local organisations and tenants; (iii) mandate genuine engagement with existing co-governance groups throughout design and operation.

6.4 Overshadowing and Park Amenity

Exhibited material indicates minimum solar access compliance (2 hours between 9 am and 3 pm) yet heavy late-afternoon overshadowing of the Waterloo Estate Park. This park will host major community events and should accommodate a future community centre; minimum compliance is not sufficient for usability and health.

Shadow diagrams suggest marginal improvements relative to earlier schemes, but the test applied is essentially “no-worse than approved.” That standard ignores how combined late-afternoon shadows from taller forms can compromise park usability for events, sports, and health.

Requested conditions: (i) additional seasonal variation and cumulative overshadowing modelling across Northern and Central towers; (ii) design changes (setbacks, tower height/shape) to improve solar access beyond minimums; (iii) commit to tree canopy and shade structures designed with community input.

6.5 Parking, Active Transport, and Servicing

Limited car parking supports mode shift, but zero parking for ~500 co-living rooms and ground-floor retail may exacerbate local parking stress. Bicycle parking numbers must be paired with safety, theft-prevention, and end-of-trip facilities. Servicing and childcare drop-off rely on the shared basement and must be actively managed.

Requested conditions: (i) dedicate car-share bays within the basement; (ii) implement parking impact monitoring with mitigation triggers; (iii) fund local cycling safety and secure bike storage; (iv) adopt a Freight/Servicing Management Plan with booking systems and childcare drop-off windows to avoid congestion.

6.6 Co-Living Model – Benefits and Risks

We acknowledge the potential benefits of co-living: housing diversity and precinct activation; possible affordability for students and young workers; and shared facilities that could foster social connection. However, the exhibited material does not publish a transparent business model or pricing controls to demonstrate better social outcomes than the earlier office proposal. Without minimum tenancy lengths, affordability caps linked to local incomes, and programmed communal spaces, co-living can drift toward hotel-style operations, undermining affordability and community stability. We also note the risk that a second co-living building could be diverted to student housing if the commercial model proves weak, reinforcing the need for binding operational safeguards.

Requested conditions: (i) publish a Co-Living Business Model & Operations Plan before determination (pricing framework, tenancy terms, community programming, complaints handling, conversion safeguards); (ii) prohibit conversion to serviced apartments/hotel use without a new DA; (iii) independent annual reporting on affordability and social outcomes.

6.7 EIS – Acoustic/Vibration, Wind, Safety

Set rail vibration and ground-borne noise criteria consistent with EPA guidance; require detailed wind testing and mitigation; ensure that CPTED principles, public-realm safety, and signage controls maintain genuinely public spaces (e.g., Cope Street Plaza).

Requested conditions: (i) Acoustic/Vibration Management Plan meeting EPA rail guidelines; (ii) Wind mitigation design and post-occupancy validation; (iii) CPTED and Public Realm Management Plans preventing privatisation of public space; (iv) Signage and advertising controls to protect character and amenity.

7. Basement Modification 3 (SSD-10438-Mod-3) – Community Concerns and Requests

Basement Mod 3 proposes internal layout and services changes (including OSD tank footprint adjustments and piling). While technical, these changes materially affect car-share location, loading, courier bays, childcare drop-off, and emergency access, with potential construction impacts.

Requested conditions: (i) reserve basement spaces for car-share and short-stay childcare drop-off to avoid kerbside congestion; (ii) update stormwater/OSD design for resilience and safety with independent certification; (iii) require a detailed Construction Traffic and OOHW Management Plan with transparent community notification and escalation pathways; (iv) ensure end-of-trip facilities are accessible and secure.

Respectful operations: The exhibited material should also commit to trauma-informed training and de-escalation protocols for site teams, with clear, non-policing escalation pathways, integrated within the CEMP and reported quarterly.

8. Cumulative Impacts and Governance – Equity as Non-Negotiable

Across the four applications, community benefit depends on binding governance and integrated delivery. The EIS and SIA must move beyond averaged statistics to address the realities of a high-poverty cluster on WMQ's doorstep. Decisions should be conditioned to ensure social, cultural, and environmental outcomes are delivered—not deferred.

- Prepare and adopt a Waterloo-wide Social Infrastructure and Governance Plan before determination, co-designed with local organisations and Homes NSW.
- Set measurable social outcome KPIs (public housing/temporary housing, affordability caps, access to childcare and community facilities, participation targets for Aboriginal tenants and organisations).
- Mandate cumulative overshadowing and wind modelling across precincts; apply design changes to protect park and street amenity beyond minimums.
- Adopt EPA-aligned rail vibration/ground-borne noise criteria and require certification at detailed design.
- Require Construction Staging and OOHW limits with a Community Oversight Panel and transparent reporting, including complaint registers and response times.
- Protect public domain character: CPTED, public realm management (no privatisation), and signage controls; commit to Connecting with Country through governance and programming, not only landscape gestures.

9. Endorsement of City of Sydney Positions

We endorse the City of Sydney's advice that parkland must not suffer additional overshadowing, that design excellence must encompass social outcomes, and that public realm and green infrastructure be delivered to high standards with Connecting with Country embedded.

11. Demolition and Construction Management – Community Health and Wellbeing

Counterpoint acknowledges that renewal and redevelopment are necessary processes; however, demolition and construction activities carry profound impacts on the daily lives, health, and mental wellbeing of Waterloo's public housing residents. Based on our extensive experience supporting this community, we recommend the following measures to mitigate risks during demolition and construction stages:

11.1 Health, Safety and Environmental Management

Dust and Noise Mitigation: Implement a comprehensive Dust and Noise Management Plan exceeding minimum compliance, including real-time air quality monitoring, proactive dust suppression (e.g., water sprays, screening), and predictable scheduling of high-noise activities to allow respite periods.

Enhanced Pest and Waste Control: Adopt estate-wide pest control protocols to prevent infestations in neighbouring homes and enforce rigorous waste management to maintain cleanliness.

Asset Recycling and Sustainable Waste Management: Commit to high recycling standards and explore creative reuse of materials for community benefit (e.g., gardens, murals, art projects).

Security as Education: Avoid heavy-handed policing; instead, train security staff to engage constructively with residents, fostering trust and reducing tension.

11.2 Communication and Community Support Infrastructure

Consider maintaining representation at the Waterloo Connect Office as a trusted physical contact point, supported by independent services.

Ensure transparent, multilingual communication through letterbox drops, SMS alerts, and in-person updates.

Establish an integrated 24-hour contact line for a rapid response.

Require de-escalation and cultural-competency training for all site staff who interact with residents.

11.3 Mental Health and Social Wellbeing

Develop a localised mental health response plan in partnership with Sydney Local Health District and NGOs.

Promote existing community centres and libraries as official respite spaces during working hours.

11.4 Collaborative Oversight

Form a complementary or integrated collaborative governance framework with the Waterloo Redevelopment Group and Waterloo Human Services Collaborative to monitor mitigation strategies.

Explore community-building initiatives such as a “Demolition Countdown” art project, pop-up chill-out stations, and resident-led temporary fencing art to foster ownership and reduce stress.

11.5 Temporary Site Repurposing

Where feasible, repurpose cleared sites for temporary accommodation or community use to minimise displacement and maintain social networks.

12. Conclusion

Counterpoint supports housing diversity and sustainable, transit-oriented precincts. Equity and integration must be non-negotiable. Without binding commitments on public and affordable housing (in perpetuity), social infrastructure, governance, amenity (including overshadowing and wind), acoustic/vibration controls, and construction management, the WMQ risks becoming an isolated enclave rather than a catalyst for inclusive renewal. We urge the Department to condition consent on the measures outlined above to ensure Waterloo Metro Quarter delivers genuine community benefit for existing and future residents.

For further info, kindly contact:

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References

- **NSW Planning Portal – Waterloo Metro Quarter Northern Precinct (SSD-79307758):**
<https://www.planningportal.nsw.gov.au/major-projects/projects/waterloo-metro-quarter-northern-precinct>
- **NSW Planning Portal – Waterloo Metro Quarter Central Precinct (SSD-79307746):**
<https://www.planningportal.nsw.gov.au/major-projects/projects/waterloo-metro-quarter-central-precinct>
- **NSW Planning Portal – WMQ Second Amending Concept (SSD-79307765):**
<https://www.planningportal.nsw.gov.au/major-projects/projects/waterloo-metro-quarter-second-amending-concept>
- **NSW Planning Portal – Waterloo Basement Mod 3 (SSD-10438-Mod-3):**
<https://www.planningportal.nsw.gov.au/major-projects/projects/waterloo-basement-modification-3-internal-layout-changes>
- **Planning process – Waterloo Integrated Station Development (public material):** <https://wisd.com.au/planning-process/>
- **Design & Amenity Guidelines / Concept Approval context:**
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9393-PA-2%2120200316T130115.942%20GMT>
- **EPA rail vibration/ground-borne noise guidance referenced in prior WMQ assessments:**
<https://www.planningportal.nsw.gov.au/major-projects/projects/amending-concept-da-waterloo-metro-quarter-osd>