URBIS

WATERLOO METRO QUARTER OVER STATION DEVELOPMENT

Basement SSD-10438 -
Response to Submissions

Prepared for
WL DEVELOPER PTY LTD
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1. INTRODUCTION

This 'Response to Submissions' Report (**RtS**) has been prepared by Urbis on behalf of WL Developer Pty Ltd to address the matters raised by government agencies, the public, and community organisation groups during the public exhibition of the proposed Waterloo Metro Quarter Over Station Development (**OSD**) State Significant Development (**SSD**) applications. Specifically, this RtS relates to the Basement SSD-10438 development application (**DA**).

The Department of Planning, Industry and Environment (**DPIE**) issued a letter to the applicant on 14 December 2020, requesting a response to the comments raised during the public exhibition period for both the amending concept DA (SSD-10441) and the four detailed SSD DA (SSD-10437), (SSD-10440), (SSD-10439), and (SSD-10438).

Where applicable, this RtS provides consolidated responses to the submissions received which are relevant to multiple applications. Conversely, separate responses are provided for the Basement SSD where the submissions received are specific to this application.

1.1. OVERVIEW

All five applications were on public exhibition from 04 November 2020 to 02 December 2020. During this period, submissions were received from NSW government agencies, the local Council, and other key public authorities. The submissions received from public authorities for the Basement SSD included those from:

- Environment Protection Authority (**EPA**)
- Water NSW
- Department of Planning, Industry and Environment - Biodiversity and Conservation Division
- Transport for New South Wales (**TfNSW**)
- Sydney Metro
- City of Sydney
- Sydney Water
- Heritage NSW
- NSW Health – Sydney Local Health District (**SLHD**)

In addition, submissions were received from neighbouring property owners and residents, the broader community, and organisation groups. The key matters raised in the agency and public submissions relevant to the Basement SSD include:

- Provision of car parking;
- Traffic generation and traffic impacts; and
- Achievement of sustainability objectives for the proposed development.

This RtS provides an in-depth and holistic response to the above key matters and all other matters raised by public authorities and community submissions. Minor design changes are also proposed to the development resulting from design development and changes proposed to the OSD above the basement in response to submissions received on the relevant applications.

Revised specialist documentation to support the revised scheme are provided in support of the RtS which includes:

- Amended Architectural Plans prepared by Woods Bagot (**Appendix A**)
- Amended Architectural Design Report prepared by Woods Bagot (**Appendix B**)
- Amended Design Integrity Report (**Appendix C**)
- Amended Design and Amenity Guidelines (**Appendix D**)
- ESD Technical Memo prepared by Cundall Johnston and Partners (**Appendix E**)

- Supplementary Traffic and Parking Assessment (**Appendix F**)
- Pedestrian Movement Memo prepared by WSP (**Appendix G**)
- Flooding Risk Assessment Memo prepared by WSP (**Appendix H**)
- Structural Statement prepared by Robert Bird Group (**Appendix I**)

2. SUMMARY OF SUBMISSIONS

2.1. BASEMENT SSD DA

A further breakdown of the submissions by respondent type and their position is provided in the table below.

Table 1 Basement Detailed SSD DA Submissions Received by Respondent Type

Submitter	Position	Number of Submissions
Public Authorities and NSW Government Agencies		
Environment Protection Authority (EPA)	Comment	1
Biodiversity and Conservation Division	Comment	1
Transport for New South Wales (TfNSW)	Comment	1
City of Sydney	Object	1
Sydney Water	Comment	1
Sydney Metro	Comment	1
Heritage NSW	Comment	1
NSW Health	Comment	1
Water NSW	Comment	1
SUBTOTAL		**9**
Community and Organisations		
General public	Support	1
General public	Object	4
General public	Comment	1
Organisation	Object	3
Organisation	Comment	1
SUBTOTAL		**10**
	TOTAL	**19**

The applicant's response to the submissions received for the detailed SSD DA is provided in the following sections of this RtS. This RtS is supported by the additional design and technical documentation provided in **Appendices A-I**.

2.2. ACTIONS COMPLETED FOLLOWING EXHIBITION

Since the public exhibition of the proposed detailed SSD DA, the proponent has undertaken the following actions:

- Meeting with the DPIE on 16 December 2020 to discuss the key matters required to be addressed in the response to submissions and the supporting assessment and design analysis required to be demonstrated.
- The proposed development was re-presented to the Design Review Panel (**DRP**) on 28 January 2021 in accordance with the Design Excellence Strategy endorsed under the concept approval. The DRP provided the following feedback:

  Basement – Planning

  – *The Panel accepts the updates to the basement design including EOTF's for the commercial, retail and asset management teams.*

Minutes of this meeting are provided as part of the Design Integrity Report at **Appendix C.**

3. AMENDMENTS TO THE PROPOSED DEVELOPMENT

3.1. BASEMENT SSD DA

Minor design changes are proposed to the layout of basement levels P1 and P2 as outlined below.

- Basement Level P1:
  - The lift pit / transfer slab at the ground level of the Northern Precinct OSD is now shown (refer to changes proposed under RtS for SSD 10440),
  - Basement perimeter wall increased for waterproofing. The minor increase in the basement footprint bears no detrimental impact on deep soil provisions,
  - The end of trip facilities (**EOTF**) layout has been updated and responds to the new basement footprint addressing waterproofing requirements,
  - Motorcycle parking on P1 redistributed from eight (8) spaces to 11 spaces (no change to total),
  - Storeroom layout adjacent to the security room updated to provide two storerooms (previously one),
  - Security room door relocated from the southern wall to the eastern wall,
  - Fire stair relocated to the south of EOTF and provision of an additional storeroom, and
  - 'Sydney Water Meter & Pump Set' room and car park air supply riser relocated.
- Basement Level P2:
  - Fire stair relocated from the Building 1 lift core and provision of an additional storeroom,
  - Motorcycle parking on P1 redistributed from five (5) spaces to two (2) spaces (no change to total), and
  - Relocation of a car space to accommodate the new fire stair location.
- Changes to Basement GFA:
  - Commercial EOTF area decreased from 260.7m^2 to 258.2m^2,
  - Retail EOTF area decreased from 32.7m^2 to 31.7m^2, and
  - Total GFA decreased from 306.4m^2 to 302.9m^2 (3.5m^2).

These changes are illustrated on the revised Architectural Drawings prepared by Woods Bagot (**Appendix A**).

It is noted that some of the amendments proposed to the maximum height of Building 1 and ground floor slab "set downs" (Level 00) of the Northern Precinct OSD are visible on the Floor Plan Level 00 and cross-section plans (refer to the RtS for SSD 10440 for further details).

4. RESPONSE TO DPIE ASSESSMENT

The DPIE wrote to the applicant on 14 December 2020 requesting a response to the submissions and matters raised during the public exhibition period for the amending concept DA (SSD-10441), and the four detailed SSD DA, being (SSD-10437), (SSD-10440), (SSD-10439), and (SSD-10438) for the Waterloo Metro Quarter OSD.

The comments provided by the DPIE requested further clarification on built form and amenity impacts (both external and internal) of the modified building envelope and detailed OSD designs. It is noted that these matters predominantly relate to the above ground works, and not to the basement proposal.

The key matters that the DPIE have requested additional information regarding are categorised under the following headings:

- Public Benefits,
- Design Integrity Reports,
- Wind Impact Assessment, and
- Active Street Frontages.

The above matters, together with the specific matters identified for each precinct, have been addressed respectively as part of the other four RtS reports. The proposed basement, the subject of this application, does not impact on the responses provided to address these key issues in the separate RtS' prepared and submitted for the Northern, Central and Southern Precincts.

It is noted that the basement does not impact on the provision of active street frontages and wind mitigation measures, or the delivery of public benefits across the Waterloo Metro Quarter site.

A Clause 4.6 Variation Request has been prepared for SSD-10440 and SSD-10437 to vary the strict application of clause 7.26 of the *Sydney Local Environmental Plan 2012* (**SLEP**) to support the construction and operation of a mixed-use OSD and public domain works.

An amended Design Integrity Report for the Basement SSD has been prepared (**Appendix C**) and includes the following additional information as requested by DPIE:

- Advice letters from each DRP review session as endorsed by Panel Chair,
- A log of advice from the above letters, indicating how it has been responded to, and where it hasn't been responded to or adopted with clear justification,
- The project team's responses to DRP advice in *Appendix C* of the Design Integrity Report, and
- A timeline for resolution of "Open" items in *Appendix C* of the Design Integrity Report as they relate to the SSD designs.

While initially raised by the DPIE as a query to the Central Precinct SSD DA (SSD-10439), as outlined in the Contamination and Remediation Strategy prepared by Douglas Partners and submitted at Appendix GG of the EIS, it is clarified that the proposed remediation works required pursuant to *State Environmental Planning Policy No. 55 – Remediation of Land* (**SEPP 55**) relate to the Basement and Southern precincts only. All works are wholly contained within the Waterloo Metro Quarter site boundary which excludes the adjacent Waterloo Congregational Church land.

In addition, the project structural engineers have confirmed that no basement excavation or building works (particularly structural foundations for buildings 2 and 3) are to be carried out on the Waterloo Congregational Church land. Further, the proposed construction works will not adversely affect the Church land. As such, landowner's consent from the Church allotment is not required. (refer to **Appendix I**).

5. RESPONSE TO PUBLIC AUTHORITY SUBMISSIONS

5.1. NORTHERN PRECINCT

5.1.1. State Public Authority Comments

A response to the matters raised by government agencies and other public authorities in relation to the Basement SSD DA is provided in Table 2 below.

Table 2 Response to Public Authority Submissions – Basement SSD DA

Comment	Response
Water NSW	
The risk to water quality is considered to be low and Water NSW has no comments or particular requirements.	This comment is noted.
Environmental Protection Authority	
No comment. As an advisory note, the development will be located in the vicinity of tunnels containing operational rail lines, for which the EPA has a regulatory responsibility. The consent should include acceptable vibration and ground borne noise limits for spaces within the development drawn from the EPA's Rail Infrastructure Noise Guideline (EPA, 2013) and Assessing Vibration: A Technical Guideline (DECC, 2006).	This comment is noted.
Biodiversity and Conservation Division	
Biodiversity A Biodiversity Development Assessment Report (BDAR) Waiver was approved on 24 July 2020.	This comment is noted.
Floodplain risk management The reports have not included flood level mapping for any scenarios, except the 1% AEP flood event plus climate change. Mapping, including water level contours at appropriate intervals, must be provided as a minimum for the 5% and 1% AEP flood events and the PMF event.	As detailed in the technical response provided by WSP at **Appendix H**, maximum flood levels for the 1%, 1% + Climate Change and PMF flood events were included in the Flood Impact Assessment submitted with the EIS (at Appendix O). Flood levels for the 5% AEP flood event were not included in the flood impact assessment report as WSP have advised they are not relevant in the determination of flood planning levels, in particular for the basement. Notwithstanding, water level contour maps (with a 50 mm contour interval) have been prepared and included in **Appendix H** for the 5%,1% AEP and

Comment	Response
	PMF flood events as requested within this submission. The technical response also outlines the finished floor levels of the ingress points to the basement.
Flood impacts of the proposed development The individual buildings of the over station development are not expected to cause any flood impacts; however, the ancillary road works are predicted to cause unacceptable impacts. An acceptable tolerance for flood level increase would be 10mm. Appears road works were not included in concept stage modelling in Concept Water Quality, Flooding and Stormwater Report of 2018. Require mitigation measures to ameliorate the flood impacts to be finalised and submitted for review by EES before a recommendation for approval can be made.	As agreed within this submission, we note the construction of the OSD buildings (and basement) are not expected to cause any flood impacts. Concern is raised in this submission regarding the acceptable tolerance for flood level increases within the surrounding road network and neighbouring properties resulting from road works. The scope of works proposed within this Basement SSD (SSD-10438) does not impact the extent of localised flooding surrounding the Waterloo Metro Quarter site.
Flood risk for the development – Flood Planning Levels Generally, floor levels are above the 1% AEP flood level and generally above the PMF level. Where required at entries to basements, 500 mm freeboard to the 1% AEP flood level appears to have been provided. However, the report has not adequately documented all the proposed finished floor levels (FFLs) to enable their comparison to the proposed FPLs. As a minimum, the FFLs need to be provided in Table 4 alongside the FPLs.	The design of the basement has responded to the flood planning levels required for the site as outlined in **Appendix H**. All points of ingress to the basement are at or above the 1% AEP + 500mm freeboard and PMF flood levels (whichever is higher).
Flood risk for the development – Residual Risk and Emergency Management Need to demonstrate “Safe refuge can be provided within the proposed development.” Issues regarding residual risk that need to be addressed and require amendments to the design. A proper assessment of the flood behaviour as it relates to emergency management is required, together with the development of a strategy for flood emergency management. Shorter and longer durations should be considered for emergency planning, not only the duration that	As outlined above, the basement is protected from potential flooding impacts given all points of ingress to the basement area at or above the PMF and 1% AEP + 500mm freeboard flood levels (whichever is higher). No evacuation is necessary from the basement as sufficient flood protection is provided within the basement. In a flood emergency occupant of the basement can remain safe in the basement until the flood emergency is finished. The site area is located at the top of the catchment and only events with short duration and high

Comment	Response
generates the peak flood level. No consideration has been given to the number of persons at risk and whether there is enough space for these individuals in the nominated shelter areas. Any persons in external licenced seating areas, must be accounted for in emergency planning. Lifts and escalators may not be operational during extreme floods. It is not considered acceptable for persons coming from the basement to exit onto the street in extreme floods. Direct stair access must be provided to refuge internal to the building. The proponent needs to confirm the suitability of the shelter in place provisions.	intensity rainfall are relevant in terms of requiring flood protection. Different storm durations have been considered for the 1% AEP, 1%AEP + Climate Change and PMF events to determine the critical storm durations that were used to define appropriate floor levels. This is consistent with the accepted standard industry approach. As indicated within the flood study report storm durations tested are the same as what was considered in the Alexandria Canal Catchment flood model which is currently adopted by CoS. An additional storm duration of 90 minutes was also considered for the 1% AEP flood event. A flood emergency management plan will be provided at a later stage of the project and prior to occupation of the building.
Transport for NSW	
Safety Assessment of the Proposed Development Requested a Stage 2 (Concept Plan) Road Safety Audit for the proposed access arrangements to the loading docks in accordance relevant Austroads guidelines. Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures in consultation with TfNSW as required.	In accordance with design criteria 3P of the Waterloo Metro Quarter Design and Amenity Guidelines (**WMQ Design Guidelines**), both the Northern and Southern loading docks include mechanical turntables to ensure service and refuse collection vehicles can enter and exit in a forward motion. This will minimise potential pedestrian and vehicle conflicts throughout the site. It is noted that comments to this affect were not provided by TfNSW at the initial RtS stage of similar OSD projects such as Victoria Cross and Pitt Street (north and south). Addressing this request at the construction stage does not compromise the implementation of design measures to address potential pedestrian or road safety (if required). In accordance with ptc's recommendation (refer **Appendix F**), it is suggested that a condition of consent is included on any consent issued for Stage 2 (Concept Plan) independent road safety audits to be carried out during the detailed design stage prior to the Construction Certificate stage to the following effect: *"Prior to the issue of the Construction Certificate, the applicant shall undertake a Stage 2 (Concept Plan) Road Safety Audit for the Loading Dock arrangements to the loading docks. This audit shall*

Comment	Response
	be undertaken in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits by an independent TfNSW accredited road safety auditor. *Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures in consultation with TfNSW as required, prior to the issue of the relevant Construction Certificate."*
Proposed Church Square Shared Zone It is requested that the applicant be conditioned to design and operate the proposed Church Square shared zone in consultation with TfNSW and in accordance with the Technical Direction - RMS TTD 2016/001 Design and implementation of shared zones including provision for parking.	The following is noted with reference to TTD 2016/001 'Design and implementation of shared zones including provision for parking': ▪ The proposed shared zone has been designed to ensure that drivers are aware of the clear pedestrian priority, including promotion of low vehicle speeds. Additional speed control devices can be provided to forcibly reduce vehicle speeds for improved pedestrian safety, where appropriate and if required. ▪ The shared zone will adopt a maximum speed limit of 10 km/h in accordance with TTD 2016/001 and the Revised WMQ Design and Amenity Guidelines. ▪ The design of the shared zone will clearly define: – Street space / kerb and gutter / delineation, – Entrance / exit points, – Traffic signs, – Pavement surface, – Traffic calming features / treatments, – Forward visibility, – Vehicle mix and accessibility requirements, – Car and bicycle parking, – Mobility and vision impaired requirements, and – Lighting and drainage. Overall, the applicant is committed to designing and operating the Church Square shared zone in consultation with TfNSW and consistent with TTD 2016/001 '*Design and implementation of shared zones including provision for parking'*. Refer to the

Comment	Response
	Supplementary Traffic and Parking memo prepared by ptc for further discussion (**Appendix F**).
Construction Pedestrian and Traffic Management Request condition to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW.	A Preliminary Construction Pedestrian and Traffic Management Plan (**CPTMP**) was prepared by ptc. and submitted at Appendix J of the EIS for SSD-10440. The CPTMP will be further updated as required prior to the issue of any construction certificate or any preparatory, demolition or excavation works (whichever is earlier), in consultation with the Sydney Coordination Office within TfNSW in response to the imposed condition of consent for construction pedestrian and traffic management.
Heritage NSW – Aboriginal Cultural Heritage (ACH)	
Table 21, under section 9.2 Mitigation Measures of the EIS, provides the proposed mitigation impacts for Aboriginal heritage whereby; *"The updated Archaeological Method Statement (AMS) prepared by AMBS (dated July 2020) must be adhered to for the full extent of excavation and construction associated with the basement. This AMS outlines the proposed excavation methodology for the subject site to manage archaeological significance and impacts."* (page 147).	There is a clerical error in *Table 21*, *Section 9.2 – Mitigation Measures* in the EIS. The item "Aboriginal Heritage" should be "Non-Aboriginal Heritage" / "Archaeology". Refer to **Table 7** in **Section 7.2.1** of this RtS which provides an amended summary of the proposed mitigation measures. The AMS prepared by AMBS relates to the methods to be implemented to manage historical (non-aboriginal) archaeology. This has been prepared in accordance with the SSI 15_7400 Condition E17. Advice provided by the AMBS recommends that no additional test excavations are required during the basement excavation. This advice is based on the preliminary findings of the 54 test pits completed during excavation of the Waterloo station box to the east of the proposed basement. As outlined in *Section 1.4 Limitations* of the AMS provided as part of Appendix H of the EIS: *Aboriginal test excavations began at the site on 12 February 2018, and a total of total of 11 stone artefacts were recovered from 54 1 x 1m2 test pits. No more than three artefacts were identified in any single test pit, and artefacts were distributed across the site, with no significant clustering of artefact locations identified. Soils inspected during excavations were representative of those found within the Botany sand sheet, and were observed to have been significantly disturbed from past land*

Comment	Response
	clearance, construction, and infrastructure installation within the study area. While analysis and reporting on the excavations has not yet been completed, preliminary analysis of the assemblage characterised it as a low-density background scatter of stone artefacts, of types common in the region, in a highly disturbed context.
The Archaeological Method Statement (AMS) itself states, under section 1.4 Limitations (page 5), that it does not address the potential for Aboriginal cultural heritage other than to recommend an Unexpected Finds Protocol. Given previous assessments for the area have already recognised there is low to moderate potential for Aboriginal objects to occur, question whether the application of an Unexpected Finds Protocol is sufficient.	*Section 1.4 Limitations* of the AMS outlines the findings of the 54 test pits completed for the Waterloo metro station box which is directly adjacent to the basement location within the Waterloo Integrated Station Development. The preliminary analysis characterises the Aboriginal archaeological findings as follows: *"…low-density background scatter of stone artefacts, of types common in the region, in a highly disturbed context. Given the observed level of disturbance across the Waterloo study area, including on the western portion of the site, it is unlikely that additional archaeological test excavations will identify intact or significant Aboriginal archaeological deposits on the site. Potential impacts and risks to Aboriginal heritage within the Waterloo Metro Quarter should therefore be managed through an application of an Unexpected Finds Protocol, and additional controls such as archaeological monitoring are not required for the currently proposed works."* Considering the above, and noting the 54 test pits and associated findings, the AMS indicates that potential impacts and risks to Aboriginal heritage across the Waterloo Metro Quarter site can be appropriately managed through implementing an Unexpected Finds Protocol.
Recommend conditions of consent include requirements for Aboriginal archaeological test excavation (and salvage when required) if and where intact natural soil profiles are identified, or where Aboriginal objects are identified as an unexpected find. The Archaeological Method Statement (AMS) should be revised to incorporate this requirement.	It is not considered appropriate to incorporate a condition of consent to this affect given the management of archaeology and implementation of the AMS, forms part of and will be completed in accordance with the CSSI Approval 7400. The relevant archaeology conditions of consent under this approval are E17-E20 and E23 and E25. As stated in section 8.4 of the EIS (*Archaeological Findings and Recommendations*): *"The recommendations of the Archaeological Method Statement are to be adhered to under the*

Comment	Response
	CSSI approval for the completion of the Waterloo Metro Quarter site, including the site the subject to the basement excavation." Overall, it is reiterated that archaeological matters will be handled appropriately under the relevant process being the CSSI Approval.
Sydney Metro Corridor Protection	
No comments.	No response required.
Sydney Water	
Water Servicing Potable water servicing should be available via a 150mm CICL watermain (laid in 1897) on Botany Road. Amplifications or alterations to the potable water network may be required complying with the Water Services Association of Australia (WSAA) code – Sydney Water edition.	As outlined in the Services and Infrastructure Report provided at Appendix T of the EIS, connection for the Northern and Central Precincts (related to the Basement proposal) is proposed to connect to the network on Botany Road. Direct connection to 150CICL Water Authority Main reticulated along Raglan Street, is proposed via a DN150 reticulated from building Water meter room. Requirements for amplifications and/or diversions will be confirmed as part of the Section 73 NoR from Sydney Water.
Recycled Water Servicing While there is no existing Sydney Water recycled water supply to this area, Sydney Water is open to working in partnership with developers to consider potential decentralised recycled water servicing solutions that may offset potable water demands for irrigation, toilet flushing and domestic washing machines, as well as air cooling towers. Consideration can also be given for rainwater capture and stormwater runoff reduction.	The ESD Reports accompanying the Northern and Central Precinct SSD DA's outlined the sustainable water targets and initiatives for buildings 1 and 2. These two buildings are physically integrated with the proposed basement. It is noted that buildings 1 and 2 are targeting a 4.5 star NABERS water rating and include initiatives such as: ▪ 4 star WELS rated taps, toilets and showers in the EOTF, landscaping design and plant selection to minimise irrigation demand, rainwater collection, best practice cooling tower water treatment and management systems, water sub-metering of major water uses and Water Sensitive Urban Design. The abovementioned sustainability initiatives will be further developed throughout the detailed design phase of the project.
Wastewater Servicing	As outlined in the Services and Infrastructure Report provided at Appendix T of the EIS, direct connection to DN225 Sewer Authority Main

Comment	Response
Wastewater servicing should be available via a 400 VC wastewater main (laid in 1891) within the property boundary. Amplifications or alterations to the wastewater network may be required complying with the Water Services Association of Australia (WSAA) code – Sydney Water edition.	reticulated along Botany Road, is proposed via a DN225 reticulated from building 1 and DN225 from building 2 Sewer networks. Requirements for amplifications and/or diversions will be confirmed as part of the Section 73 NoR from Sydney Water.
Stormwater Our available records indicate there that a major Sydney Water stormwater channel located on the western side of Cope Street. As per current Sydney Water's policy and guidelines for building over and adjacent to stormwater assets requirements, no buildings or permanent structures are to be proposed over the stormwater channel / pipe or within 1m from the outside wall of the stormwater asset or within Sydney Water easement whichever is larger. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height. The proponent would be required to submit the elevation drawings with the stormwater channel/ pipe, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application.	As outlined in the Services and Infrastructure Report provided at Appendix T of the EIS, stormwater drainage for the site is proposed to comply with the City of Sydney A4 Drainage Design Guidelines and City of Sydney – Interim Floodplain Management Policy. Direct connection to DN900 Authority Main, reticulating along Botany Road is proposed via a DN300 reticulated from building 1 Onsite Detention tank and DN300 reticulated from the building 2 Onsite Detention tank. The potential connection to the Sydney Water asset along Cope St will be further evaluated during the detail design phase post DA submission. Requirements for amplifications and/or diversions to the City of Sydney and Sydney Water assets will be confirmed as part of the detailed design phase post DA submission. It is not currently anticipated that amplifications will be required to the existing Botany Road DN900 Pipe.
NSW Health	
Cumulative Impacts Consider cumulative impacts and mitigation measures beyond those normally employed for isolated impacts.	Potential broader cumulative impacts on concurrent / consecutive projects and further mitigation measures will be considered and managed accordingly throughout the ongoing detailed design, construction and operational phases of the project. Where appropriate, additional mitigation measures will be considered and implemented when required.

Comment	Response
Noise Impacts Support the amended plans resulting in fewer residences experiencing traffic noise exceedances than were expected from earlier plans. All reasonable and feasible mitigation measures should be undertaken to further minimise traffic noise exceedances to residences requiring alternative sources of ventilation. All reasonable and feasible best practice noise mitigation measures should be undertaken to minimise exceeding noise management levels, including mitigating noise generated by truck movements as well as engaging an acoustics consultant given the size of the overall development.	Whilst not directly related to the Basement SSD, to date we note that all reasonable and feasible acoustic mitigation measures have been considered and implemented into the detailed design of the residential buildings within the Central and Southern precincts. Refer to the respective RtS' for these projects for further discussion / response.
Public/active transport incentives Support the incentives to use public, active, and shared transport. Clarify on basement plans if access to parking/bike parking/car share spaces is equitable for those in social housing, affordable housing, and private housing residences.	The basement car park accommodates vehicle parking to support several uses including commercial office, residential accommodation, social housing, the adjacent church and metro. In addition, the basement facilitates provisions for car share spaces, commercial and retail EOTF, as well as commercial, retail and residential bicycle parking to encourage and support active and public transport opportunities available at the Waterloo Metro Quarter site and within the surrounds. The Basement Level P1 Plan clearly denotes parking spaces for affordable housing, private housing, social housing and car share. This includes 67 parking spaces for private and affordable housing (for Building 2), eight (8) social housing spaces (for Building 4) and a total of four (4) car share spaces. These provisions are below the maximum permissible parking spaces in accordance with relevant SLEP 2012, SDCP 2012 and Concept SSD 9393 conditions of consent. Furthermore, the parking provisions are suitable for the number of apartments for the overall Waterloo Metro Quarter site and are consistent with the objective of providing reduced car parking in proximity to public transport. The suitability of the proposed parking provisions are discussed further in **Table 3** of **Section 5.1.2**.

Comment	Response
	All parking areas are easily accessible via the respective lift cores for Buildings 1 and 2, as well as off Church Square.
Water recycling/rainwater Support water recycling however public health risks from using recycled water will need to be managed appropriately, including approval by the appropriate regulatory authorities.	Noted. The proposal will ensure potential public health risks from using recycled water will need to be managed appropriately
Contamination Recommend remediation of western portion of the site in accordance with the Contamination Strategy as prepared by Douglas Partners (SSD-10437 - Southern Precinct EIS Appendix 00).	Remediation of the site will be carried out in accordance with the Contaminated Sites Strategy prepared by Douglas Partners (dated 24 July 2020) for the Southern Precinct (SSD-10437) and Basement (SSD-10438) proposals. It is anticipated that a condition of consent will be included on any consent issued for remediation to be carried out accordingly.
Recommend using SLHD guidelines Building Better Health.	As outlined in Section 8.13 of the EIS, various environmental and health issues have been considered and addressed in relation to matters such as built form, amenity, air quality, traffic and parking, construction, infrastructure, stormwater and water recycling, accessibility, fire safety, social and economic impacts and crime and safety. It is noted that the EIS was accompanied by an ESD Report which included health and well-being objectives, a Construction Environmental Management Plan (**CEMP**) to address construction impacts, a Stormwater Management Strategy to ensure appropriate treatment of runoff and a Transportation Air Quality Management Plan which confirmed the proposal will not be impacted by adverse air quality. In addition, the design incorporated Crime Prevention Through Environmental Design principles and security risks to mitigate potential health risks associated with anti-social and criminal behaviour. Overall, the proposal will not result in any unacceptable local and regional health impacts and includes appropriate mitigation measures to further mitigate potential environmental impacts and health risks.

5.1.2. City of Sydney Comments

A response to the matters raised by the City of Sydney either to the entire Waterloo Metro Quarter OSD proposal or specifically in relation to the Basement SSD DA is provided in Table 3 below.

Table 3 Response to City of Sydney Submission – Basement SSD DA

Comment	Response
Social planning and community land uses	
Affordable housing	Not applicable to this SSD DA. However, it is noted that the affordable housing proposed to be located within the Central Precinct (SSD-10439) will dedicated to a community housing operator to be utilised as affordable housing in perpetuity.
A wholistic approach to development	Not applicable to this SSD DA. However, it is noted that to avoid duplication of infrastructure and community uses, a 'whole of precinct' approach has been adopted in the development of the Waterloo Metro Quarter OSD. It is understood that future community infrastructure within the Waterloo Estate will be required to consider approved community infrastructure uses within the Waterloo Metro Quarter.
Engaging with the community	This comment is noted, however is more relevant to the built form proposed applications.
Centre-based childcare	Not applicable to this SSD DA. Refer to the Central SSD-10439 RtS.
Social enterprise café	Not applicable to this SSD DA. Refer to the Central SSD-10439 RtS.
Makerspace	Not applicable to this SSD DA. Refer to the Southern SSD-10437 RtS.
Place Manager	Not applicable to this SSD DA.
Voluntary Planning Agreement	Not applicable to this SSD DA.
Non-compliance with development standards	
Active Frontages - The location of services and infrastructure in areas fronting Botany and Wellington Street is contrary to Clause 7.27 and Section 3I of the Waterloo Metro Design and Amenity Guidelines.	The Botany Road frontage contains three small portions of façade which are not considered activated through business premises or retail premises. These portions of Building 1 and Building 3 contain an entrance to end of trip facilities, a fire stair exit, substation, fire control room, switch room and other critical building services. Additionally, the Wellington Street frontage contains two substations, a fire control room and two stairs accessing the mezzanine level above. A detailed Clause 4.6 Variation request has been prepared and is submitted with the RtS for SSD-10437 and SSD-10440. The request concludes that the minor variations to the

Comment	Response
	development standard are justified in the circumstances of the case, as: ▪ The objectives of the development standard are still achieved. ▪ Additional internal activation ensures precinct wide activation is achieved. ▪ There are sufficient planning grounds to support the proposed development. Whilst not directly related, it is noted that the proposed basement design does not compromise the provision of active frontages throughout the Waterloo Metro Quarter site.
Location of loading facilities - It would have been preferable for loading facilities to be co-located underground within the basement car park to allow for greater activation on these streets and reduce vehicle crossings across the site. However, it is acknowledged that this option would require excavation under the Church which does not form part of the application site and that the driveway is required on Botany Road for servicing the metro.	This comment is noted. Service vehicle entry points have been located as envisaged under the Concept SSD DA to ensure the overall site operations and functionality of both the metro station and commercial aspect of the remaining development.
Clause 4.6 – The applicant must provide a statement addressing Clause 4.6 of the SLEP to overcome non-compliance with Clause 7.27.	This comment is noted. A detailed Clause 4.6 Variation Request has been included as part of the Northern and Southern Precinct RtS'.
Design Excellence	
Wind	Not applicable to this SSD DA.
Awnings	Not applicable to this SSD DA.
Building 1 (Amending Application)	Not applicable to this SSD DA.
Building 1 (Northern Precinct)	Not applicable to this SSD DA.
Building 2 (Central Precinct)	Not applicable to this SSD DA.
Buildings 3 and 4 (Southern Precinct)	Not applicable to this SSD DA.
Amenity – central residential building	Not applicable to this SSD DA.
Amenity – social housing	Not applicable to this SSD DA.
Natural ventilation and noise	Not applicable to this SSD DA.

Comment	Response
Landscaping	
Landscape drawings lack some critical information required to confirm the detail and viability of the proposals.	Not applicable to this SSD DA. It is noted that no change is proposed to the deep soil provision across the site as a result of the minor proposed changes to the basement layout.
Deep soil – Deep soil is underprovided. Sydney DCP and ADG both have a minimum deep soil dimension of three metres. Many of the proposed garden beds are less than this three metre minimum and it is noteworthy that the remaining quantity of compliant deep soil relies heavily on permeable paving. City staff calculate that approximately 470sqm or 5.7% of the site area is allocated to deep soil.	Not applicable to this SSD DA. The basement does not compromise the provision of deep soil zones and it is noted that the basement footprint has been specifically setback to enable the provision of deep soil planters in the respective public domain areas.
Tree Protection	
City does not support the high number of trees and existing canopy coverage proposed for removal.	It is noted that the majority of the public domain works will be delivered as part of the CSSI approval, including the retention/removal of any existing street trees within the setback areas to the respective street frontages. The basement footprint has been setback from Raglan Street to the north and from Botany Road to the west (particularly in front of the Central Precinct) to enable deep soil planting zones which will accommodate new street trees that will provide tree canopy coverage and shading. New street tree planting will be coordinated with the final services design.
The location of any new driveway must ensure it does not require the removal of any existing street tree. The driveway shall be appropriately setback so as it does not adversely impact on any existing street trees both below and above ground.	Whilst not directly related to this proposal, it is noted that the basement access driveway/dive structure off Church Square is internal to the site.
All new street trees must be planted in accordance with the City's STMP 2011, this includes species, adequate spacing (refer to Part D Section 2.2 STMP), soil and tree pit type etc. Newly planted trees must meet Australian Standard 2303: Tree Stock for Landscape Use (2015).	Not applicable to this SSD DA. It is noted that the basement does not impact on the provision of street tree planting and has been appropriately setback from the site boundaries and public domain areas at ground level to enable appropriate planting.

Comment	Response
All street tree plantings must be in accordance with the City's Street Tree Master Plan 2011. The street trees must be a minimum container size of 200 litres, at the time of planting and stock must be sourced well in advance.	
Heritage	
Construction Management – request CMP includes specific construction methodology strategies to ensure that bulk excavation adjacent to the Waterloo Congregational Church will have no physical impact on the stability of the ground beneath.	The CEMP developed by John Holland dated 30 September 2020 and included at Appendix Q of the EIS will be further developed prior to commencement of construction and address specific construction methodology strategies to ensure that bulk excavation adjacent to the Waterloo Congregational Church will have no physical impact on the stability of the ground beneath.
A detailed dilapidation report of the church and surrounds to record the existing conditions should be prepared and submitted for approval prior to works commencing on site.	This comment is noted, and as noted in the Structural Statement prepared by RGB (**Appendix I**), it is anticipated that this requirement will inform a condition on any development consent issued for the Waterloo Metro Quarter OSD.
If any damage to the church fabric occurs during the excavation or the construction, it should be reported to DPIE and City of Sydney along with a remediation report to rectify the works in consultation with the heritage consultant.	This comment is noted, and it is anticipated that this requirement will inform a condition on any development consent issued for the Waterloo Metro Quarter OSD.
Vibration measurements should be conducted on the structure of the Waterloo Congregational Church to ensure the vibration generated on the structure does not exceed the values for cosmetic damage and structural damage outlined in BS 7385 and DIN 4150.	This comment is noted, and it is anticipated that this requirement will inform a condition on any development consent issued for the Waterloo Metro Quarter OSD.
Detailed material, colours and finishes schedule and sample boards to be provided for all the buildings.	This comment is noted. Additional details regarding materials and finishes are provided within the RtS reports for the Northern, Central, and Southern Precinct SSD DAs.
A detailed Heritage Interpretation Strategy should be prepared in consultation with the Council, implemented prior to OC and certified by their Heritage Consultant to Council's satisfaction. The HIS should be	This comment is noted, and it is anticipated that this requirement will inform a condition on any development consent issued for the Waterloo Metro Quarter OSD.

Comment	Response
developed in conjunction with the Landscape and Public Art strategies.	
Adopt all heritage and archaeology related recommendations and strategies in the Heritage Impact Statement, Geotechnical Report, Structural Report, Public Art Strategy, Landscaping Strategy and Heritage Interpretation Strategy.	Noted. All heritage and archaeology related recommendations and strategies in the Heritage Impact Statement (including AMS prepared by AMBS), Geotechnical Report, Structural Report, Public Art Strategy, Landscaping Strategy and Heritage Interpretation Strategy will be implemented. It is noted that archaeological works will be carried out under the CSS approval process.
Transport	
Walking access (a) Concerned regarding pedestrian priority and functionality of the new shared street and the surrounding intersections during peak hours (having regard to Section 3D of the Waterloo Metro Design and Amenity Guide), particularly morning peak is of concern. Vehicle parking on the site should be constrained further to reduce conflicts between people walking to and from the site and people driving through the shared zone.	The Supplementary Traffic and Parking memo prepared by ptc (**Appendix F**) reiterates that the projected peak hour trip generation for the proposed basement car park is approximately 57 trips, representing a net reduction of 41 trips in comparison to the reference scheme within the concept approval (98 trips). The projected traffic generation of 57 trips is deemed a low traffic volume equating to less than one (1) vehicle trip per minute. The approximate 40% reduction in vehicular trips per hour will reduce potential conflicts between pedestrians and vehicles. With reference to TTD 2016/001, '*Design and implementation of shared zones including provision for parking*', the following is noted: ▪ The proposed shared zone has been designed to ensure that drivers are aware of the clear pedestrian priority, including promotion of low vehicle speeds (10km/h). Additional speed control devices can be provided to forcibly reduce vehicle speeds for improved pedestrian safety, where appropriate and if required. WSP have noted that the majority of pedestrians accessing the metro station would utilise Grit Lane or Cope Street Plaza to access the zebra crossings and bus stops along Botany Road. The combination and dispersion of pedestrian movement via these alternate pathways, together with the lower vehicle volumes, reduces pedestrian movements across or through the shared zone and further reduces potential pedestrian-vehicle conflicts (**Appendix G**). The shared zone will be fully designed at the detailed design stage and will be submitted to TfNSW for approval. The shared zone will be subject to an independent safety audit process to assess the safety aspects of the proposed layout. In addition, a Traffic Management Plan will be prepared and submitted to TfNSW for approval of the design and suitability (refer **Appendix F** for further discussion).

Comment	Response
(b) It is recommended that level of service for walking follow Transport for NSW's guidance to ensure that sufficient space is provided to achieve comfortable environments which encourage people to walk as relevant to the NSW context.	The 'Walking Space Guide' recommends a minimum of level of service (**LoS**) C should be achieved. Internal and adjacent footpaths to the WMQ achieve a LoS C or better for both 'interchange' and more onerous street criteria typically adopted in a high-pedestrian environment such as Waterloo Metro Quarter. Raglan Walk and Grit Lane can be considered as a Type 3 or 4 footpath due to the proximity to the metro station (i.e. within 200m) and the number of peak hour users (70-2000 per hour). For these footpath types, a minimum footpath width of 3-3.7m is recommended to achieve a LoS C. The proposed design adopts the "not adjacent" width as it includes additional footpath space (in addition to the clear width) that may comprise street furniture and/or retail frontage. As per the WMQ *Project Delivery Agreement* between the applicant and Sydney Metro, minimum footpath requirements for the project include a minimum clearance width (free of retail frontages or furniture) of 3.5m for key connections has been provided. This has been determined to accommodate the anticipated pedestrian flows for the metro station. It is noted that the footpath provision at these locations is significantly wider, though may include some retail frontage or furniture. Overall, the minimum requirements are satisfied. Raglan Place may represent a 'Type 5' footpath (minimum of 3.9m) as it is within 50m of the metro station. The design provides a footpath width of 5.5-6.5m to achieve a LoS C or based on the peak number of pedestrians per hour. Other internal connections can be treated as Type 2 or 3 footpaths due to their proximity and comparatively lower patronage. In this regard WSP notes the following: ▪ Cope Street Plaza and Church Square – sufficient width for the shared zone is proposed. ▪ Church Lane and Church Yard – behave as Type 2 connections as both developments front onto Wellington Street as their main walkable connection, hence the proposed widths in combination with the adjacent walkable landscaped areas provide sufficient width and capacity. Overall WSP have confirmed that pedestrian movement throughout the Waterloo Metro Quarter OSD satisfies the *Walking Space Guide* requirements (**Appendix G**).
Vehicle parking (a) The vehicle parking proposed for residential and commercial use is	The proposed vehicle parking for the site is considered suitable to support the proposal for the following reasons:

Comment	Response
excessive for a transit-oriented development and should be minimised.	▪ The Waterloo Metro Quarter has site specific parking controls set out through the WMQ Design Guidelines, Concept SSD 9393 conditions of consent and the SDCP 2013 which contemplated the proposed parking provisions for the site and future development. ▪ The proposal incorporates parking below the maximum permissible rates to reduce private vehicle dependence and encourage active and sustainable modes of transport (supported by the delivery of compliant bicycle parking provisions and EOTF). – As outlined in the Traffic and Parking Impact Assessment submitted with the EIS, the beforementioned controls permit a total of 272 parking spaces for all proposed uses. The basement provides a total of 155 spaces which is well below the maximum permissible rates (approximately 43% below). – Ptc have identified that the proposed residential parking provisions for the Building 2 represents 84% of the maximum SLEP provision and almost half the current average for the Waterloo area. In addition, ptc state that the proposed commercial office parking provisions for Building 1 represents 80% of the maximum SLEP provision and is suitable to service the estimate occupancy of over 3,000 commercial workers (refer to **Appendix F**). ▪ Proposed basement parking will alleviate on-street parking pressures in the surrounding Waterloo area and considers that not all origins from which people are travelling from are well connected. ▪ For precedent, it is noted that the Victoria Cross OSD was approved with 150 car parking spaces to support commercial office and retail uses which was contemplated under the CSSI approval. Whilst located in a different LGA, it is considered similar contextually as an OSD located within a CBD location. Overall, the proposed parking provisions are consistent with the controls applying to the site and suitable to support the land uses as envisaged. The proposal has struck a balance between providing parking below the maximum permissible rates to reduce private vehicle dependency and encourage active/sustainable transport, whilst also alleviating on-street parking pressures within the surrounds. Further to this point, whilst the WMQ destination is well connected, the origin from where people are travelling from may not be. Refer to the Supplementary Traffic and Parking Assessment prepared by ptc for further detailed discussion (**Appendix F**).

Comment	Response
(b) The amount of parking directly impacts the overall objective of the new metro line which aims to reduce reliance on cars. The mode share targets to shift private car users to public and active transport uses will never be achieved without making the parking supply competitive.	As previously outlined, the proposal provides vehicle parking at approximately 43% below the maximum permissible controls applying to the site, and as such, the proposal seeks to reduce reliance on private car ownership and encourages the use of active and sustainable transport. In addition, the proposal is accompanied by a Green Travel Plan (**GTP**) (Appendix I of the EIS) which sets future mode share targets including 40% by train, 25% by walking, 10% by bus and 5% for cycling. These targets are directly aimed at shifting transport usage towards active and public transport methods.
(c) DPIE are strongly advised to insist the proponent work together with the development partners, TfNSW, RMS and strive for 'zero' car parking provision or absolute minimums.	Comments provided from TfNSW have been addressed in **Section 5.1.1**. It is noted that no specific comments were provided requiring nil parking provisions. The maximum parking controls for the WMQ site are consistent with those applicable to other highly accessible areas such as the Sydney CBD. The SLEP 2012, SDCP 2012 and Concept SSD 9393 conditions of consent clearly establish a framework that has contemplated the maximum parking provisions that is suitable. Again, it is acknowledged that the proposal provides parking at approximately 43% below the maximum permissible rate. This clearly demonstrates the proposal is consistent with the planning objectives and controls with regards to parking. Further, the proposal seeks to reduce the reliance of automobile dependency and encourages active and sustainable transport to support strategic visions for a '30-minute city'.
(d) If parking is to be provided, accessible car parking space provision should be prioritised and provided for as per SDCP. All accessible car spaces are to be allocated to adaptable units.	As outlined in Section 6.13 of the EIS, all accessible parking spaces provided are allocated to adaptable apartments or visitor spaces in accordance with the provisions of the SDCP 2012. Accessible car parking spaces are provided at the same reduced rate of overall car parking proposed for the residential development. Notably, accessible car parking spaces exceed 15% of all residential car parking proposed, aligning with the rate anticipated by the SDCP 2012 while also balancing a desire to reduce car parking spaces on site.
(e) Parking for loading and servicing should be prioritised over general vehicle parking. Given the rate of vehicle parking provided the site should provide for the required amount of loading and servicing.	The purpose of the proposed loading docks is to serve the servicing and maintenance needs of the WMQ site as a whole. As such, the approach to determine the service vehicle parking provisions considers the ability of the service bays to accommodate more than one vehicle per day in each dock, as well as the additional courier bays provided within the basement. The proposed loading and servicing provisions are

Comment	Response
	appropriate to support the proposed land uses and maximises on the grouping of land uses.
Traffic modelling (a) It is unclear from the submitted documentation if the traffic modelling includes the cumulative traffic generation from adjacent developments plus the projected traffic generation for the subject proposal.	The traffic modelling does not currently include defined traffic generation from adjacent developments as this information it not currently finalised or available. However, to ensure that the network is being tested to the extent that new developments are expected, the traffic modelling includes a background traffic growth up to the design year.
(b) The zero trip generation rates for student housing are unrealistic.	Zero car parking spaces are proposed for the student accommodation within Building 3. This is consistent with other student accommodation developments in the locality (i.e. Iglu Broadway, UrbanNest Darlington). Zero trip generation is therefore reflective of the car parking provision. It is further noted that the residents of the student accommodation are less likely to own private cars than occupants of residential flat buildings, and are anticipated to use public transport and active travel options readily to and from the site.
(c) The traffic modelling should include changes to the street network and intersections proposed as part of the Metro development.	The future road network improvements associated with the Sydney metro station have been included in updated traffic modelling provided at **Appendix F** (Attachment 1).
Bike parking (a) Bike parking and end of trip facilities should be maximised and world class in design and provision to assist in the transition away from private vehicle use.	This comment is noted. The proposal will deliver bicycle parking and end of trip facilities to encourage sustainable modes of transport and maximise patronage of Sydney Metro. As outlined in the EIS submitted with SSD-14038, the basement design accommodates bicycle parking and end of trip facilities (showers and lockers) for commercial and retail uses in accordance with the SDCP 2012 controls. Bike parking for student accommodation is not relevant to this SSD DA.
Loading and servicing (a) The proposal presents a shortfall of loading and servicing and should be provided as per the SDCP 2012 rates.	If the loading dock requirements are calculated separately for each land use type within the development, this results in a shortfall in service vehicle parking. However, this approach ignores the ability to accommodate more than one vehicle, per day, in each dock and dismisses the efficiencies created by grouping land uses. The proposed loading docks and service bays within the basement car park will be managed by means of an integrated site-wide booking system. This will allow each bay to be pre-booked prior to arrival to ensure that there are available bays for any delivery or service vehicles. A concept timetable has been prepared as part of the FSMP to demonstrate that there

Comment	Response
	are a large number of time slots available which allow the bays to be shared across the site amongst the different components of the development. In this regard, the proposed loading/servicing provision is considered acceptable and able to be managed for the coordination of deliveries and servicing. An additional B99 service vehicle space has also been provided within the Southern Precinct loading dock within the RtS for SSD-10437.
(b) All loading and servicing should occur onsite and the development should not be potentially reliant on kerbside loading arrangements which are open to other users and subject to change.	Loading and servicing will occur within the designated loading docks on-site or the service vehicle bays within the basement. The proposed development does not rely on kerbside loading zones.
(c) Parking for loading and servicing should be prioritised over general vehicle parking.	The Northern and Southern loading docks are provided with access and egress driveways separate from the basement parking area and therefore do not interact with the general parking access driveways. The remaining service bays located in the basement, will be line marked and signed accordingly and will be solely for the use of general service/loading vehicles (e.g. residents moving into residences and unloading utes and vans).
(d) The design of the loading areas to accommodate a City of Sydney 9.25m waste collection vehicle is supported. This needs to be ensured and should be conditioned.	As outlined in the Supplementary Traffic and Parking Assessment prepared by ptc. (**Appendix F**), the loading docks have been designed to accommodate entry and egress of a 9.25m Council waste vehicle.
Sustainable development	
General – consider advancing sustainable outcomes.	The ESD Report and Sustainability Strategy submitted as part of the EIS outlines the relevant goals/targets and sustainability initiatives for the project (largely related to the Northern and Central Precincts of which the basement supports). These will be further developed throughout the ongoing detailed design, construction and operation phases of the project.
Green star – encourages the Applicant and DPIE to move to the new Green Star Buildings tool.	Refer to the ESD Report and Sustainability Strategy submitted Appendix M of the EIS for SSD-10438.
SSD 10438 – Energy Efficiency and GHG: The City supports the “capability to expand the electric vehicle charging to 100% of spaces in the car park” (page	Cundall have prepared an ESD technical memo in direct response to the comments raised (refer **Appendix E** for further details). Electrical infrastructure in the basement has made allowance for future vehicle charging through trickle charging. Trickle

Comment	Response
27 of ESD Report) however further information is to be provided accordingly. How will this be achieved? Energy efficiency initiatives regarding lighting and mechanical ventilation, including technology and performance targets, are anticipated to be now known and should be committed up front	charging can service vehicles that are stationary for long periods of time, such as throughout the working day for commercial tenants or overnight for residential tenants. The car parking is fitted with sufficient overhead cable trays which will be used to support the electrical distribution, with charging stations to be fitted to structural columns. The basement is being designed in line with the 5.5 star NABERS Energy target for Building 1 and will result in a high level of energy efficiency. The system specifics have not been fully resolved at this stage, particularly the ventilation strategy, however the nominal solutions will be: ▪ LED lighting design to a low power density, ▪ Suitable controls to the light to ensure they are switched off when not required, with a balance of safety and security, ▪ Carbon monoxide control of all ventilation, and ▪ Variable speed control to the supply and exhaust ventilation based on the pollutant levels. These measures will be further developed and refined throughout the detail design phase of the project. The car park design represents best practice for a below ground car park which cannot utilise and daylight or ventilation.
Public Art	Not applicable to this SSD DA.
Waste	
Requests that the developer use the waste calculator and demonstrate that sufficient area has been provided to meet the needs of each use proposed on site. Please note that the City discourages more than 3 collections per week to minimise traffic movements.	Waste collection for the Northern and Central precincts relates to the loading dock provided within the ground floor level accessed off Botany Road. As such, this does not relate directly to the basement proposal and this matter will be addressed in the respective RtS' for the Northern and Central precincts.
The turntable is to be a minimum dimension of 10.5 metres in accordance with the City's Guidelines for Waste Management and Section 3P of the Waterloo Metro Design and Amenity Guidelines.	Not applicable to this SSD DA. The waste collection turntable is provided in the Northern Precinct loading dock and will be addressed under that RtS. Notwithstanding, ptc notes that this requirement refers to the minimum turning radius of the waste vehicles accessing the service area and does not relate to the diameter of the turntable. As outlined previously, the Northern and Southern Precincts loading docks have been designed to accommodate 9.25m waste collection vehicles and their turning circles with a minimum 300mm clearance.

Comment	Response
Sufficient space must be provided for food waste for each relevant use.	The food waste collection area is accommodated within the loading dock situated within the ground floor of the Northern Precinct. This matter will be addressed in the RtS for the Northern Precinct (Building 1).
Signage	Not applicable to this SSD DA.
Public domain	Not applicable to this SSD DA.

6. RESPONSE TO COMMUNITY AND ORGANISATION SUBMISSIONS

Table 4 provides a detailed response to the public submissions and **Table 5** provides detailed response to the organisation submissions as they relate to the detailed Basement SSD DA only.

Table 4 Response to Public Submissions

Comment	Response
Provision of car parking	
▪ Should provide greater number of car share vehicle spaces. ▪ Too much parking space. ▪ Should consider power points for installation of car charging stations in each car parking space. ▪ Inadequate car parking space for residential units, support workers, care providers, nursing staff and student accommodation - may create adverse impact on the local streets. ▪ Project requires more consideration of providing more parking for units and student accommodation to minimise impacts on local streets	▪ The proposed development provides car share parking for the residential and commercial land uses in accordance with the guidelines and concept DA (SSD 9393) conditions of consent. The basement incorporates 4 car share parking bays, two each for buildings 1 and 2. ▪ Overall, the development provides a maximum of 155 car parking spaces, which is less than what is permitted under the concept DA (SSD 9393) conditions of consent. The proposal seeks to strike a balance to support a reduction in the reliance of private vehicle ownership across the Waterloo Metro Quarter site and encourage active / sustainable modes of transport, whilst alleviate on-street parking pressures within the surrounding area. ▪ As outlined in the ESD Technical Memo (**Appendix E**), the proposal will install electrical vehicle trickle charging to nominated car parking spaces as required to meet total demand. The basement has made allowances for future vehicle charging to 100% of spaces (if/when required). The car park is fitted with sufficient overhead cable trays which will be used to support the electrical distribution, with charging stations to be fitted to structural columns.
Traffic generation and traffic impacts	
▪ Consider widening of Botany Road for additional bus lane. ▪ There is no bus stopping bay at the Waterloo station on Botany Road. Busses may block a lane on the extremely busy Botany Road. ▪ The proposed loading dock on Wellington Street is concerning for pedestrian, cyclists and driver safety. The location of the loading dock will also	▪ Botany Road is a publicly owned and managed road situated outside the property boundary and scope of this proposal. ▪ There are two new bus stops provided on Raglan Street and Botany Road. Widened footpaths around the perimeter of the precinct will enable waiting bus passengers to safely queue whilst also allowing pedestrians to pass. ▪ The loading dock accessed off Wellington Street relates to the Southern Precinct and not the basement

Comment	Response
create traffic congestion on Wellington Street, as a number of vehicles wait to access the loading dock area on a very small stretch of road on Wellington Street. Vehicles will also increase the noise levels for apartments directly facing. The loading dock should be relocated to Botany road to create a more effective and safer access and exit point. ▪ Increase traffic congestion on surrounding road network,	proposal. Notwithstanding, it is noted that the Southern Precinct loading dock incorporates a mechanical turntable to ensure loading/servicing vehicles enter and exit in a forward direction, mitigating potential pedestrian/cyclist safety impacts. Further, a Freight and Servicing Management Plan (FSMP) was submitted as part of Appendix I of the EIS. The FSMP outlines that the loading dock will be available for use by appointment only through the use of an online booking system, which will allocate the times and durations vehicles will be allowed to access the site, any potential queuing onto the external road network will be minimised. ▪ As outlined in the EIS and accompanying Traffic and Parking Impact Assessment, the traffic modelling undertaken demonstrated that the external road network will continue to operate at an acceptable level of service and experiences no changes in current level of service or at a level of service less than the concept approval (SSD 9393), and therefore, the development is not considered to have a detrimental impact on the operation of the road network.
Increased pedestrian movement	
▪ Future increased pedestrian movement across Botany Rd and Wyndham St should be considered. ▪ Adequate provision of pedestrian crossing should be considered for safety.	Modelling and analysis of the existing and future pedestrian and cyclist movement, connectivity and circulation within the extent of the site and to surrounding areas have been assessed in the Pedestrian Modelling Report prepared by WSP (attached at Appendix I of the EIS for the Basement SSD-10438). An additional Pedestrian Movement Technical Memo has been provided to address potential concerns raised by TfNSW (refer **Appendix G** of this RtS). This assess the likely pedestrian movements throughout and around the site. The Waterloo Metro Quarter precinct design is compliant with the project requirements under the 2056 assessment scenario within the internal walkways, footpaths surrounding the site, Raglan Street and Botany Road and Raglan Street and Cope Street intersections, Botany Road bus stops. A new pedestrian crossing on Botany Road will provide direct connection to the proposed Grit Lane and the metro stations, providing safe pedestrian connection into the site.

Table 5 Response to Organisation Submissions

Comments	Response
Counterpoint Community Services	
Community consultation concerns: The pre-lodgement consultations were significantly disadvantaged by Covid19 restrictions and the effectiveness of which questionable.	As outlined in the EIS and Pre-Submission Consultation Report prepared by Elton Consulting, the timeframe for engagement coincided with the restrictions imposed to respond to the COVID-19 pandemic. Accordingly, engagement activities were modified to comply with requirements to minimise community exposure and transmission. Whilst opportunities to conduct face to face engagement were limited, the applicant hosted a series of online events from May to July 2020 for the surrounding community and key stakeholders to respond to emerging ideas and designs for the over station development.
General comment on amended proposed plans: Traffic congestion around the site or safe pedestrian accesses / connectivity and it is considered a missed opportunity by the government, not the proponent.	Traffic modelling previously undertaken demonstrated that the external road network will continue to operate at an acceptable level of service and therefore, the development is not considered to have a detrimental impact on the operation of the road network. The traffic modelling for vehicles accessing the basement car park within the site indicates the projected peak hour trip generation is approximately 57 trips. This represents a net reduction of 41 trips when compared to the concept DA, which projected 98 trips. The Waterloo Metro Quarter OSD provides an interconnected network of internal pedestrian walkways and external footpaths. This high degree of permeability provides a safe environment for pedestrians navigating their way around and through the precinct.
Traffic and pedestrian safety: ▪ Concern over Pedestrian traffic across Botany road to South Eveleigh. ▪ There needs to be adequate pedestrian and bike paths around the Metro Quarter	The Pedestrian Movement Memo prepared by WSP (**Appendix G**) confirms that all internal walkways, external footpaths and intersection queues achieve a LoS C or higher in accordance with TfNSW *Walking Space Guide*. As previously stated, a new zebra crossing is being provided across Botany Road as part of the Waterloo metro station. Internal walkways such as Grit Lane and Church Square (shared zone) directly connect to the bus stop and crossing on Botany Road.

Comments	Response
	Bike paths are provided around the Waterloo Metro Quarter site, which link directly into the regional cycle network via the bike path on Wellington Street.
Northern Precinct & Basement Car Park: ▪ Inadequate provision of parking ▪ Create a balance between providing sufficient parking and discourage car reliance.	The basement accommodates vehicle parking in accordance with the concept DA conditions of consent (SSD 9393) and relevant SDCP 2012 controls. This strikes a balance between providing car parking below the maximum permissible rates to reduce reliance on private car ownership whilst being appropriate to support the operation of the Waterloo Metro Quarter OSD and alleviate on-street parking pressures within the surrounding area.
Waterloo Public Housing Action Group	
The number of carpark spaces have not been fairly distributed across private, affordable and housing residents. We proposed that the car parking is reallocated to reduce the number of commercial spaces and redistribute to private, affordable and social housing.	The proposed parking is consistent with that which was permitted and effectively contemplated under the concept approval SSD 9393 conditions of consent.
Inner Sydney Voice	
General concerns: ▪ Increased foot and vehicle traffic across Botany Road to South Eveleigh. ▪ The development should provide adequate pedestrian and cycling infrastructure.	The Pedestrian Movement Memo prepared by WSP (**Appendix G**) confirms that all internal walkways, external footpaths and intersection ques achieve a LoS C or higher in accordance with TfNSW *Walking Space Guide*. A new zebra crossing is being provided across Botany Road as part of the Waterloo metro station. This can be accessed via Grit Lane and Church Square (shared zone), as well as pathways around the site. Bike paths are provided around the Waterloo Metro Quarter site on the surrounding road network which link directly into the regional cycle network via the bike path on Wellington Street. The basement accommodates bicycle parking and EOTF to support pedestrians and cyclists accessing the site and utilising the metro. Visitor bicycle parking is provided across the site throughout the ground plane and within the Sydney metro EOTF area.

Comments	Response
REDWatch	
Basement Car Park: It is recognised that there should be minimal parking. However, the increase in residential and commercial will increase existing problematic parking issues in the area. Appropriate compromise will be to increase parking that is targeted for certain needs. There should be ample space for carers and health professionals/ Parking should ideally be managed separately from the tenancies allowing for better utilisation of parking during working and after work hours. This also allows for retrofitting of charging points or change of use over the life cycle of the building.	As previously discussed in response to other public and community organisation submissions, the basement facilitates provisions which strike a balance between providing car parking below the maximum permissible rates to reduce reliance on private car ownership whilst being appropriate to support the operation of the Waterloo Metro Quarter OSD and alleviate on-street parking pressures within the surrounding area. The basement provides purpose-built car parking to support the proposed commercial, retail, residential including affordable and social housing uses across the Waterloo Metro Quarter. The ESD Technical Memo outlines the potential to provide EV charging points to allocated bays in the future (**Appendix E**).

7. REVISED PLANNING ASSESSMENT

7.1. ASSESSMENT OF PROPOSED MODIFICATIONS

This section provides an assessment of the amended design proposal against the relevant statutory planning framework including relevant Acts, environmental planning instruments, draft environmental planning instruments, and development control plans under section 4.15 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). The arguments presented and assessment of the strategic and statutory planning frameworks provided in the EIS for SSD-10438 remains relevant given the minor nature of design changes proposed and the proposal continues to demonstrate strategic merit and statutory compliance. This is reiterated in the table below.

Table 6 Assessment of amended proposal against relevant statutory planning framework

Consideration	**Response**
Strategic Planning Context	The minor design changes proposed to the basement car park remain consistent with the strategic planning framework as outlined in the EIS previously submitted with SSD-10438. The basement provides additional bicycle parking provisions and EOTF to encourage active and sustainable modes of transport. It also supports reduced vehicle parking provisions below the maximum permissible rates.
Acts	
Environmental Planning and Assessment Act 1979	The proposed development remains consistent with the objects and general terms of the EP&A Act as outlined in the EIS submitted with SSD-10438.
Biodiversity Conservation Act 2016	The assessment provided in the EIS for SSD-14038 remains applicable and it is noted a BDAR waiver was issued by DPIE and OEH on 28 July 2020. Additional biodiversity and conservation matters raised by Environment, Energy and Science Group (**EES**) within DPIE have been addressed in Section 5.1.1 of this report.
SEPPs	
State Environmental Planning Policy (State and Regional Development)	The proposal remains SSD in accordance with clause 12 of the SRD SEPP as a subsequent DA under the concept DA (SSD 9393).
State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)	In accordance with clause 85 and 104 of the Infrastructure SEPP, the application was referred to Sydney Metro and TfNSW for comment. Comments received from TfNSW have been addressed in Section 5.1.1 of this report. It is anticipated that relevant conditions will be included on any consent issued for key traffic and parking documentation to be updated in consultation with the Sydney Coordination Office of TfNSW.
State Environmental Planning Policy (Building Sustainability Index: Basix) 2004	The proposed design amendments to the basement layout do not impact upon building 2 achieving compliance with the BASIX requirements. This matter will be further addressed in the Central Precinct RtS.

Consideration	Response
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	The proposed changes do not increase the basement envelope / footprint and as such, the assessment provided with the EIS submitted with SSD-10438 remains applicable. The site is within an established urban area and all vegetation, buildings and structures has been undertaken under a separate CSSI approval.
State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55)	No changes are proposed to the Contaminated Sites Strategy prepared by Douglas Partners and submitted at Appendix GG of the Basement SSD-10438 EIS. As such, the assessment provided within the EIS remains applicable. It is anticipated that relevant conditions of consent will be included on any consent issued for remediation works to be undertaken in accordance with the Contaminated Sites Strategy previously submitted.
State Environmental Planning Policy No. 64 (Advertising and Signage) (SEPP 64)	Not applicable to this SSD DA.
State Environmental Planning Policy No. 65 (Design Quality Residential Apartment and Apartment Design Guide. (SEPP 55)	Not applicable to this SSD DA.
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	Given the nature of the proposal relates to the excavation and construction to support the basement, the proposal will not have any view or visual impacts above those considered as part of the concept SSD DA as it sits below ground level.
Draft State Environmental Planning Policy (Environment)	The assessment provided within the EIS remains applicable. The site continues to be defined within the Sydney Harbour Catchment and continues to not be located in any specific zones contemplated by the SREP. On this basis, the previous assessment of the general principles of the SREP remain relevant.
Sydney Local Environmental Plan 2012	The minor design changes proposed to the basement ensure the proposal continues to not exceed the maximum car parking provisions contained within the SLEP 2012 or SSD 9393. As discussed throughout the RtS and the EIS submitted with SSD-10438, the proposal seeks to minimise on-site car parking provisions to reduce reliance on private vehicle ownership.
Design Guidelines / SDCP 2012	It is acknowledged that minor amendments have been made to the WMQ Design Guidelines (**Appendix D**) including updated imagery throughout and changes to objectives/criteria in Sections 3C, 3D, 3J, 3K and 3N to reflect changes to the OSD proposed predominantly within the amending concept DA (SSD-10441). The proposed parking provisions (vehicle, bicycle and loading/servicing) and EOTF accommodated within the basement remain consistent with the criteria and controls outlined in the amended WMQ Design Guidelines and SDCP 2012.

Consideration	Response
Environmental impacts	The amended design does not result in any adverse impacts above those previously considered and assessed within the EIS and supporting specialist documentation submitted with SSD-10438. In particular, it is noted that key issues raised in the submissions with regards to potential traffic and parking impacts have been further justified in direct response to the comments provided from TfNSW, City of Sydney and the community (refer to Tables 2, 3, 4 and 5 throughout this RtS).
Social and Economic	The proposed changes do not compromise the assessment of social and economic impacts provided within the EIS submitted with SSD-10438. In particular it is noted that the basement design will maintain the mitigation measures previously outlined such as access control points throughout and general measures including intuitive wayfinding signage for pedestrians and cyclists and CCTV and passive surveillance.
Public Interest	As outlined in the EIS submitted with SSD-10438, the proposal remains in the public interest as it primarily supports the commercial and residential land uses proposed across the Waterloo Metro Quarter site in the Northern and Central Precincts. The basement itself provides reduced vehicle parking to minimise reliance on private vehicles and accommodates bicycle parking for all uses, residential storage and EOTF to encourage active and sustainable transport modes, support the concept of the '30-minute city'.
Site Suitability	As outlined in the EIS submitted with SSD-10438, the proposed basement is permitted with consent under the SLEP 2012 and supports permissible commercial office, retail and residential uses within the Northern and Central Precincts. As such, the site remains suitable to support the proposed development.

7.2. SUMMARY OF MITIGATION MEASURES (AS AMENDED)

The following section provides updated mitigation measures that have resulted from the amended design response to the submissions. For clarification purposes, any new additions are marked as '**bold**' and any changes no longer relevant have been struck through.

7.2.1. Basement Mitigation Measures

Table 7 below outlines the amended mitigation measures for the basement as a result of the minor design changes and the clarifications provided throughout this RtS in response to the submissions received.

Table 7 Updated Mitigation Measures

Item	Potential Impact	Mitigation Measure
~~Aboriginal Heritage~~ **Archaeology and Non-Aboriginal Heritage**	Potential impacts on ~~Aboriginal~~ **historical (non-Aboriginal)** ~~places of~~ significance (Construction).	~~The updated Archaeological Method Statement (AMS) prepared by AMBS (dated July 2020) must be adhered to for the full extent of excavation and construction associated with the basement. This AMS outlines the proposed excavation methodology for the subject site to manage archaeological significance and impacts.~~

Item	Potential Impact	Mitigation Measure
		The recommendations of the Archaeological Method Statement are to be adhered to under the CSSI approval for the completion of the Waterloo Metro Quarter site, including the site the subject to the basement excavation.

8. CONCLUSION

This Response to Submissions (RtS) Report has been prepared by Urbis on behalf of the Waterloo Developer to address the matters raised for SSD-10438 during the public exhibition period from 04 November 2020 to 02 December 2020.

The proposal includes a two-level basement car park which the supports the northern, southern and central precincts through the provision of vehicle parking for commercial, residential affordable and social housing components, as well as bicycle and end of trip facilities to encourage sustainable modes of transport and maximise patronage of the Sydney metro.

This RtS report provides a thorough consolidated response to address the various issues raised by the DPIE, City of Sydney, public authorities, community organisations and the general public. Minor design amendments have been made to the basement levels P1 and P2, including:

- Refined perimeter wall for waterproofing,
- Updated end of trip facilities (EOTF) layout to respond to the new basement footprint,
- Relocation of some car parking and motorcycle spaces, fire stairs and services provision, and
- Minor decrease in the total GFA from 306.4m^2 to 302.9m^2 (3.5m^2).

This RtS and the EIS previously submitted with SSD-10438 demonstrates that the proposal is appropriate for the site within the WMQ and warrants approval by the NSW Minister for Planning and Public Spaces, for the following reasons:

- The proposal contributes to the achievement of the objectives for development within the Eastern City District as outlined within the relevant strategic plans and policies. The proposed basement accommodates car parking, storage, and services to support a mixed-use development on the Waterloo Metro Quarter site.
- The proposal satisfies the applicable State planning policies and relevant environmental planning instruments that apply to the site.
- The proposed car parking within the basement is approximately 43% less than the maximum car parking provision permitted under the conditions of SSD 9393 and the SLEP 2012, supporting a reduction in the reliance of private vehicle ownership across the Waterloo Metro Quarter site, whilst providing sufficient parking to support the proposed uses and alleviate the on-street parking in the surrounding area.
- The proposed basement accommodates bicycle parking and EOTF for the commercial and retail (building 1, 2 and 3) tenants in accordance with the rates prescribed within the SDCP 2012, thus, supporting the Sydney metro and encourage active and sustainable modes of transport.
- All above ground ingress points to the basement remain adequately protected from the Probable Maximum Flood event and associated stormwater and flood waters. The increased perimeter wall provides further waterproofing for the basement.
- The proposed design amendments to the basement footprint continue to ensure that adequate soil depths can be accommodated within the public domain to facilitate new street trees and planting along Botany Road and Raglan Street, including the Raglan Street Plaza, providing canopy coverage and shading for pedestrians.
- The proposed amended design of the basement has considered and is integrated with, the detailed design of the Waterloo metro station and its related works including the design and construction of the northern and central precinct developments and the surrounding public domain areas (at ground level).

Overall, the proposal integrates with the Waterloo metro station and supports the proposed commercial, retail and residential development contained within the northern, central and southern precincts. As documented in the Design Integrity Report, the revised design is supported by the Design Review Panel and complies with the Waterloo Metro Quarter Design and Amenity Guidelines. The proposal is in the public interest and should be approved by the NSW DPIE, subject to conditions of consent.

9. DISCLAIMER

This report is dated 15 February 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of WL DEVELOPER PTY LTD **(Instructing Party)** for the purpose of Response to Submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

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

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

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

APPENDIX A AMENDED ARCHITECTURAL PLANS

APPENDIX B AMENDED ARCHITECTURAL DESIGN REPORT

APPENDIX C AMENDED DESIGN INTEGRITY REPORT

APPENDIX D AMENDED DESIGN AND AMENITY GUIDELINES

APPENDIX E ESD TECHNICAL MEMO (SUSTAINABILITY STRATEGY RESPONSES)

APPENDIX F SUPPLEMENTARY TRAFFIC AND PARKING ASSESSMENT

APPENDIX G PEDESTRIAN MOVEMENT MEMO

APPENDIX H SUPPLEMENTARY FLOOD RISK ASSESSMENT

APPENDIX I STRUCTURAL STATEMENT

URBIS