



Your ref: SSD-109645990
File no: MC-26-00003

2 April 2026

NSW Department of Planning, Housing and Industry
GPO Box 39
SYDNEY NSW 2001

Recipient: Mathieu.santoso@dpie.nsw.gov.au

Attention: Matthieu Santoso

Dear Matthieu,

Request for SEAR's – Parkland Estate, Rouse Hill

Thank you for the opportunity to comment on the Secretary's Environmental Assessment Requirements (SEARs) for the proposed development for the proposed development at 2 Grassland Street, 5 Torrelli Street, and Hasluck Street, Rouse Hill (known as Parkland Estate, Rouse Hill), which is a State Significant Development proposal under section 4.36 of the Environmental Planning and Assessment Act 1979.

We strongly oppose the proposal proceeding ahead of the Tallawong State-led rezoning. Advancing the concurrent rezoning proposal and development application would result in out-of-sequence strategic planning and infrastructure delivery, effectively locking in site-specific outcomes before the completion of the broader strategic study. Doing so overlooks critical issues that would prevent timely housing delivery at the site and may undermine the State-led rezoning process currently underway.

We understand that the SEARs may need to be requested to comply with the Housing Delivery Authority (HDA) requirements, however we strongly request that an exemption to the HDA timeframes is provided for any sites that are part of a concurrent State-led rezoning process to ensure optimal outcomes for the precinct. This would achieve the following outcomes.

1. That the strategic planning can occur in a timely and unprejudiced manner, and subsequent state significant development applications can be lodged to facilitate the timely delivery of dwellings.
2. That adequate provision of infrastructure and land for services (retail, commercial, community services) is made to account for additional residential density beyond what is already planned for, including the need for social infrastructure, open space and recreation facilities, and transport and traffic optimisation opportunities. These are critical to ensure the long-term success of the high-density precinct envisioned for Tallawong.
3. That funds for studies are not duplicated, and strategic work is funded and prepared in a coordinated way. The applicant will be required to prepare a range of studies to

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

support the concurrent rezoning, which will inherently duplicate the studies already being funded and underway by the NSW Government for the State-led rezoning.

We strongly oppose the proposal and our reasons for this position are comprehensively set out in this correspondence, with our main objections summarised as follows:

1. The proposal does not align with the intent of the Housing Delivery Authority to prioritise developments capable of commencing quickly. This outcome cannot be achieved on sites relying on the HDA pathway for a rezoning that is separated from a concurrent development assessment process.
2. The proposal conflicts with the proposed Tallawong state-led rezoning process, which enables a coordinated, precinct-wide approach to planning for the Tallawong Town Centre, covering approximately 31 hectares. In contrast, the proposal represents an out of sequence approach that would limit the ability to achieve optimal outcomes across the precinct.

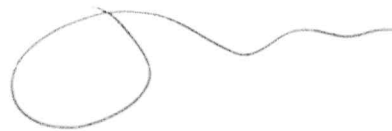
Despite our objection to the process, we have undertaken a review of the applicant's request for SEARs and the accompanying Planning Proposal, and our requirements are outlined in this correspondence. Should the Department of Planning, Housing and Infrastructure determine that the proposal possesses sufficient merit to proceed, we respectfully request that all these council requirements also be incorporated.

If you require any additional information regarding this matter please contact our Senior Development Assessment Planner, Lashta Haidari on 9839 5943 or email to Lashta.Haidari@blacktown.nsw.gov.au.



Judith Portelli

Manager Development Assessment



Jaime Hogan

Manager Urban Planning and
Economic Development

RESPONSE TO SEAR's REQUEST – BLACKTOWN CITY COUNCIL

PROJECT: SSD-109645990 – Parkland Estate, Rouse Hill

LOCATION: Lots 6, 7, and 8 within DP 271065 – 2 Grassland Street, 5 Torrelli Street, and Hasluck Street, Rouse Hill

COUNCIL REFERENCE: MC-26-00003

Part 1 – Planning Proposal

Executive summary

Council does not support the proposed rezoning for the subject sites. The proposal is inconsistent with the intent of the NSW Government's State-led rezoning process, which must have primacy to ensure coordinated, precinct-wide planning is supported by infrastructure delivery. Progressing ahead of this process is premature, and risks pre-empting and potentially prejudicing critical investigations into infrastructure, transport, open space and urban design, which is necessary to support coordinated and optimal growth.

Moving the proposal ahead of the State-led is inconsistent with the State-led rezoning and the approach outlined in the NSW Government's draft Sydney plan and New approach to strategic planning discussion paper. While we continue to support housing delivery, further uplift in this location without commensurate infrastructure would place unreasonable pressure on existing communities and contradict orderly planning principles. Accordingly, the proposal is considered premature and strategically unjustified.

1. The Tallawong Town Centre State-led rezoning process must take precedence to ensure coordinated, precinct-wide planning

In August 2025, the NSW Government announced a State-led rezoning for the Tallawong Town Centre. Council supports this process as a means to manage additional growth alongside infrastructure delivery. The proposal conflicts with the timing of the State-led rezoning process, with the applicant seeking to progress ahead of the State-led rezoning. This approach is not supported.

The State-led rezoning is intended to enable a coordinated, precinct-wide approach to planning for the Tallawong Town Centre, covering approximately 31 hectares. In contrast, the proposal represents an out of sequence approach that would limit the ability to achieve optimal outcomes across the precinct.

We are aware that the NSW Government, through the Housing Delivery Authority (HDA), has received multiple expressions of interest from landowners in Tallawong seeking to progress residential development as State Significant Development. We have consistently advised that these proposals should not proceed in isolation and that the precinct should be considered holistically.

The State-led rezoning is anticipated to be exhibited in May 2026 and finalised in November 2026, with the potential to deliver an additional 2,500 dwellings beyond current controls. This SSD proposes 1000 dwellings, representing approximately 40% of the anticipated additional yield under the State-led rezoning.

The State-led rezoning is supported by technical studies addressing open space, transport, infrastructure, feasibility and urban design. These are critical to understanding cumulative impacts and ensuring appropriate infrastructure is delivered.

Progression of individual proposals in advance of the State-led rezoning risks establishing development parameters that may constrain the ability of the precinct to achieve optimal urban structure, infrastructure staging and equitable distribution of density. Consistent with previous advice, we consider proposals seeking to utilise the HDA pathway should not proceed in isolation where a broader precinct planning process is underway.

2. Strategic and site-specific merit

On 2 June 2025, the HDA recommended that a separate declaration be made in respect of each stage for each of the three stages, which aligns with the HDA requirement that a proposal can begin quickly and deliver housing. Instead, the proponent has sought to use the HDA pathway for securing a concept plan across all three stages while, concurrently progressing a development application for just one of the stages.

This approach effectively seeks to secure uplift in development capacity across the broader site through a concept proposal, without demonstrating detailed merit for each stage or alignment with the intended staging approach contemplated by the HDA.

It is also noted that the proponent has increased their proposed dwellings from 750 at the EOI stage, to 1000 as part of their request for SEARs, representing a material increase in development intensity beyond that considered at the EOI stage. This is juxtaposed with a further HDA recommendation that the applicant be advised that a merit assessment may result in lower development standards and dwelling yield than proposed in the EOI application.

Alignment must be made between the scale of the uplift sought and the level of detailed justification provided. A nexus must be established, and the Department should not consider any component of a rezoning that is not directly linked to a concurrent development application.

3. The broader planning principle

This proposal sets a concerning precedent for how housing delivery is balanced against other critical community needs. Blacktown City has consistently accounted for a large share of Sydney's housing and is projected to exceed housing targets. However, delivering even more housing in excess of this comes at the expense of critical community infrastructure, including adequate green open space and community facilities, which is unreasonable and contradicts orderly planning principles.

Planning requires balancing housing with high-quality, equitable community outcomes. We are already exploring areas in the city for housing delivery that are more suitable and have accessible public transport, including in our Corridor strategy between Mount Druitt and Toongabbie.

Accepting this proposal would set a precedent that housing can be delivered anywhere, irrespective of land use constraints or infrastructure capacity, and without regard for the existing strategic investigations being progressed for the area by both local government and state government.

5. Planning proposal requirements

Notwithstanding our position that the proposal is premature and not supported, the following information would be required should the Department determine to proceed with the assessment.

We categorise this planning proposal as Complex under the NSW Government's Local Environmental Plan Making Guideline as it proposes:

To change the land use zone and/or the principal development standards of the LEP, which would result in a significant increase in demand for supporting local, regional or State infrastructure and would require infrastructure funding.

The following considerations and supporting technical documents are recommended in accordance with NSW Government's Local Environmental Plan Making Guideline – Attachment C.

Item	Request
Aboriginal Cultural Heritage Report	Required
Affordable housing	The proposed affordable housing should remain in perpetuity, enforced by consent condition, if the application is approved.
Heritage Impact Statement and/or Study	Required to check the impact on State significant heritage item Rouse Hill Estate. In previous precinct planning, this has been considered through the current height plane being set to respect views and vistas from the estate. and is also being considered in the proposed Tallawong State-led rezoning. Therefore, this must also be considered by the proponent.
Infrastructure Servicing Strategy	Required
Social and Community Assessment Report	Required
Transport and Traffic Report	Required
Urban Design Report	Required
Water Cycle and Stormwater Management	Required

These requirements are to allow consideration of the planning proposal portion of the proposal, and additional requirements will be identified other parts of this report.

Part 2 – SEAR’s Requirements

Blacktown City Council requests that the following matters be addressed/included, in addition to the standards SEAR’s requirements:

Deliverables

1. Contributions and Public benefits

The proposal seeks to significantly intensify development on the land. This will increase demand for additional infrastructure and services above what has been anticipated.

The application must provide technical studies that identify and address the development's impact on local infrastructure, including but not limited to open space, community facilities, and traffic/transport facilities.

It is expected that the application will address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit.

Where the development proposes alternative public benefits or a departure from an existing contributions framework, Blacktown City Council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.

Where a voluntary planning agreement is proposed, prepare a draft planning agreement offer in accordance with the Planning Agreements – Practice note (February 2021).

The application must also provide detailed information on any proposed affordable housing. Any affordable housing must be used for this purpose in perpetuity.

2. Engagement

Demonstrate that engagement and consultation activities have been undertaken in accordance with the Undertaking Engagement Guidelines for State Significant Projects and identify how issues raised, and feedback received have been considered in the design of the project.

In particular, the proponent must consult with:

- the relevant Department assessment team
- Blacktown City Council
- any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City)

3. General Documentation/Deliverables Requirements

3.1 Design Quality

- a) Demonstrate how the development will achieve:
 - i) design excellence in accordance with any applicable EPI provisions

- ii) good design in accordance with the seven objectives for good design in Better Placed
- b) Demonstrate that the development:
 - i) has (or will be) reviewed by the State Design Review Panel (SDRP) where required under the NSW SDRP: Guidelines for Project Teams
 - ii) Recommendations of the SDRP are addressed, where engagement with the SDRP has occurred prior to lodgement.
- c) Built form and urban design
 - a) Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.
 - b) Provide an assessment of the development against:
 - i) the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG), including a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria
 - c) Provide a floorplan outlining the gross floor area and dwellings that are to be provided as affordable housing.
 - d) Assess how the development complies with the relevant accessibility requirements.

3.2 Environmental Amenity

- a) Assess amenity impacts on the surrounding locality, including lighting impacts, reflectivity, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.
- b) Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, comparing the proposed development, existing situation and a development with no bonuses applied.
- c) Provide a table demonstrating how the development addresses the design principles for residential apartment development set out in Schedule 9 of State Environmental Planning Policy (Housing) 2021.
- d) Provide a table demonstrating how each dwelling addresses the key design criteria set out in the Apartment Design Guide including justification where the criteria is not met.

3.3 Visual impact

- a) Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.
- b) Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.

3.4 Public space

- a) Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site).
- b) Demonstrate how the development:
 - i) ensures that public space is welcoming, attractive and accessible for all
 - ii) maximises permeability and connectivity
 - iii) maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection
 - iv) maximises street activation
 - v) minimises potential vehicle, bicycle and pedestrian conflicts
- c) Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.

3.5 Trees and landscaping

- a) Provide a detailed site-wide landscape plan, that:
 - i) details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area).
 - ii) Street Tree planting plan, which includes species of trees, root barriers, and maintenance details.
 - iii) retains significant trees, including street trees.
 - iv) demonstrates how the development would:
 - v) contribute to the long-term landscape setting in respect of the site and streetscape
 - vi) mitigates the urban heat island effect and ensures appropriate comfort levels on-site
 - vii) contributes to the objective of increased urban tree canopy cover
 - viii) maximise opportunities for green infrastructure consistent with Greener Places.

3.6 Traffic, transport and accessibility

- a) Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW, which includes:
 - i) an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections
 - ii) pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading
 - iii) analysis of the impacts of the proposed development during construction and operation, including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development, identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments.
 - iv) measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including proposed arrangements with Blacktown City Council and/or TfNSW) of any infrastructure improvements in accordance with relevant standards.
- b) Provide a preliminary Green Travel Plan which promotes sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high-quality end-of-trip facilities.
- c) Provide a preliminary Construction Traffic (or Transport) Management Plan (CTMP) as part of the TIA to mitigate any predicted construction vehicle routes, access and parking arrangements, and coordination with any other construction occurring in the area.

3.7. Noise and vibration

- a) Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines.
- b) Detail construction and operational noise, and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.

3.8 Water Management

- a) Detail the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluate opportunities to reduce water demand (such as recycled water provision).
- b) Details the proposed drainage design (stormwater and wastewater) including any on-site treatment, reuse and detention facilities, water quality management measures and nominated discharge points.
- c) Demonstrate how the development complies with Blacktown City Council's drainage and stormwater requirements.

3.9 Flood risk and overland flows

- a) Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the NSW Flood Risk Management Manual.
- b) Provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01 that assesses flood behaviour and flood risk to the existing community.
- c) Detail design solutions and operational procedures to mitigate flood risk where required.
- d) Ground and water conditions
- e) Assess potential impacts on soil resources and related infrastructure, including:
 - i. soil erosion
 - ii. salinity
 - iii. acid sulphate soils.

3.10 Contamination and remediation

- a) Assess and quantify any soil and groundwater contamination in accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021.
- b) Demonstrate that the site is suitable (or will be suitable, after remediation) for the development.

3.11 Ecologically sustainable development (ESD)

- a) Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development.
- b) Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.
- c) Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.

3.12 Waste management

- a) Provide a hazardous materials survey for buildings proposed to be demolished.
- b) Provide a preliminary Waste Management Plan which:
 - I. identifies, quantifies and classifies the likely waste streams to be generated during construction and operation
 - II. outline show waste generated by the individual land uses proposed in the development will manage, reuse, recycle and safely dispose of waste
 - III. identifies appropriate servicing arrangements for the site.

3.13 Aboriginal cultural heritage

- a) Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by:
 - i) identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application
 - ii) engaging with, and responding to feedback from, Blacktown City Council's Dharug Panel, or
 - iii) providing an initial assessment of the potential impacts.
- b) If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site.

3.14 Environmental heritage

- a) Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment, prepared in accordance with the relevant guidelines.

3.15 Social impact

- a) Provide a Social Impact Assessment prepared in accordance with the Social Impact Assessment Guidelines for State Significant Projects.

3.16 Infrastructure requirements and utilities

- a) In consultation with relevant service providers:
 - assess the impacts of the development on existing utility infrastructure and surrounding service provider assets
 - identify any on-site and off-site infrastructure to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained
 - provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.

3.17 Construction, operation and staging

- a) Provide details of how construction and operation would be managed and any impacts mitigated.

We also require:

- Architectural Plans (scaled and dimensioned) to include (but not limited to):
- Schedule Tables of key numeric features to include:
 - Gross Floor Area (and Floor Space Ratio) to be broken down to:
 - Residential GFA.
 - Car parking (per basement level and total).
 - Storage provision (basement and apartment).
 - Apartment Mix.
- Section Plans to intersect through the highest points of the development relative to existing ground level (referencing the extrapolated ground level method (*Bettar v Council of the City of Sydney*, [2014] NSWLEC 1070) and existing ground level method (*Merman Investments Pty Ltd v Woollahra Municipal Council* [2021] NSWLEC 1582).
- Site Analysis to include impact on surrounding area.
- Building Separation Plans in response to the Apartment Design Guide (ADG).
- Shadow Diagrams to show shadows cast hourly between 9.00am and 3.00pm on 21 July.
- View from the Sun diagrams depicting hourly sunlight access between 9.00am and 3.00pm on 21 July.
- Height Plane Diagrams.
- Gross Floor Area (GFA) plans (to include numeric provision).
- Deep Soil Area plans (to include numeric provision).
- Communal Open Space area plans (to include numeric provision).
- Solar Access Plans (internal) (to include numeric provision).
- Cross Ventilation Plans (internal) (to include numeric provision).
- Bulk Excavation Plan.
- Schedule of Materials and Finishes.
- Landscape Plans (prepared by a qualified Landscape Architect), which includes species selection.
- Landscape Design Statement.
- Civic Plans (Public Domain) to include:
 - Concept Plan showing arrangement of public domain upgrade works fronting the site and connecting with existing adjoining public domain infrastructure.
 - Location/s and details of vehicular crossings. Design of vehicular crossings are to be as per Council DCP and relevant Australian Standards.
 - Swept path analysis used for the largest vehicle used for the development.
 - Building access levels from footpath at public domain.
 - Landscape plans and arborist report showing the impact of existing trees at public domain due to the development.
 - Survey plans showing the location of existing infrastructures such as ramp, council lintel pits roundabout, traffic signals and median islands. Surveys should also include levels for boundary, existing road and kerb and gutter.
- This work may include, but is not limited to:
 - New granite foot paving/shared user path.
 - New street trees (utilising strata vault systems if required to maintain the long-term health of street trees).

- Relocation, adjustment or lowering of subsurface utilities or access pits to facilitate compliant levels along the frontages of the site.
- Any works to facilitate efficient traffic management or safety as specified by Councils Traffic Engineer.
- Boundary identification Survey Diagram to include (but not limited to):
 - Boundary locations and dimensions.
 - Spot levels.
 - Easements.
 - Signage Plans (if signage proposed).
 - Subdivision Plans (if subdivision proposed)

Supporting Documentation

- Environmental Impact Statement (EIS).
- Heritage Assessment Report
- Statutory Compliance Assessment To provide compliance tables of the proposal against the ADG and relevant DCP.
- Estimated Cost of Development prepared by a qualified Quantity Surveyor.
- BASIX Certificate(s) and NaTHERS Certificates.
- Details of staging of development and subsequent approval pathways for future applications.
- Design Verification Statement/Design Report.
- Visual Impact Assessment
- Material and finishes schedule (+ elevations that depict this)
- Arboricultural Impact Assessment (AIA).
- Visual Impact Assessment and photomontages taken from key vantage points
- Acoustic Report (noise and vibration), noting the construction noise and vibration impacts on nearby residences).
- Traffic and Parking Impact Assessment
- Pedestrian Wind Impact Assessment report.
- Access report.
- Air Quality Impact Assessment, including cumulative impact during construction and any proposed mitigation measures.
- Preliminary Site Investigation (PSI) and any subsequent contamination reports stemming from the results of the PSI.
- Stormwater strategy and flood precinct study (including Water Sensitive Urban Design).
- Sustainability Management Plan or Environmentally Sustainable Development (ESD) report.
- Geotechnical Assessment report prepared by a qualified Geotechnical Engineer.
- Construction Management Plan.
- Utilities and Infrastructure Assessment.
- Net Zero Statement.
- CPTED Assessment.
- Public Arts Plan.
- Waste Management Plans including:
 - Operational; and
 - Construction and Demolition.

We note that there appears to be inconsistencies between this description within the scoping report itself and the urban design concept plan. Clarity should be provided.

Part 2 – Supplement Commentary

Specific Department Comments

1.Drainage

The following provides supplementary/explanatory comments from Council departments to items included in the above list.

1. The development is located within R3 Zone, the following requirements apply:
 - a) Temporary On-site Stormwater Detention (OSD) must be provided to service the entire site. The OSD will remain in place until Council's regional basin and associated drainage infrastructure are constructed and fully operational. The OSD system must be designed and calculated in accordance with Council's OSD deem to comply spreadsheet.
 - b) A permanent on-lot water quality treatment system must be provided, and the design must comply with Council's WSUD Developer handbook 2020.
2. A legal point of discharge for the site stormwater must be identified and provided. Where a new connection to a drainage easement within private land is required, written consent from the relevant landowner must be submitted to support the proposed connection.

Required documents and information:

1. Stormwater Management Plan:

Provide a comprehensive stormwater management plan and report that includes:

- Detailed design of the OSD system
- Water quality treatment system
- OSD and water quality treatment catchment plans that must align with the OSD design spreadsheet and the MUSIC model nodes respectively
- Internal drainage design
- Legal point of discharge

All designs must comply with Council's Engineering Guide for Development.

3. OSD Calculations: Submit an electronic copy of Council's OSD "Deemed-to-Comply" spreadsheet used for the OSD design.
4. MUSIC Model: Provide an electronic copy of the MUSIC model demonstrating that the proposed water quality treatment measures achieve Council's pollutant reduction targets.

2. City Architect

The City Architects Office require the below reports and drawings as a minimum to assess the above development:

1. Architectural Drawing Set including the below:
 - Site and Context Plans
 - Diagrams describing the response to quantitative ADG requirements including;
 - Communal open space
 - Deep soil
 - Building separation distances
 - Natural ventilation
 - Solar access
 - Shadow diagrams
2. Material and finishes schedule (+ elevations that depict this)
 - Plans should include site setback lines
 - Height Plane drawing – elevations and sections to clearly show natural ground line and height of building line.
 - Landscape Drawing Set and Report
 - Design report / Design Verification Statement
 - Visual Impact Assessment Report

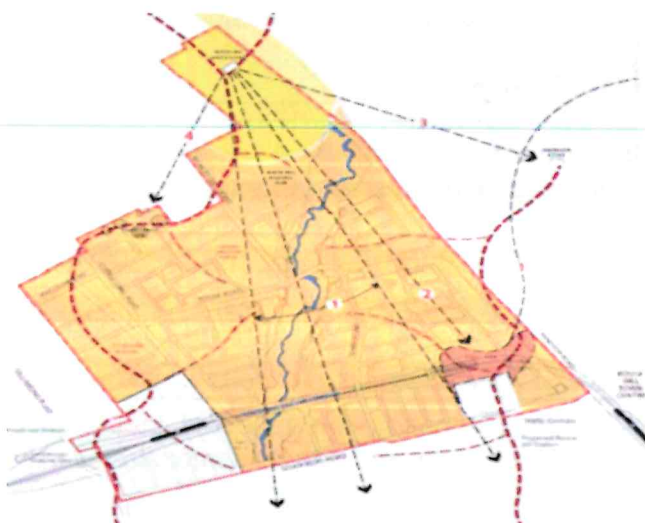
3. Social Planning

1. **Social Infrastructure Needs Assessment** - this must demonstrate the impact and mitigation measures created, ensuring the proposed population increase has access to community facilities and social infrastructure. The applicant must acknowledge and respond to the existing deficit of facilities within the sites catchment and present solutions to service the increase of residents, such as a VPA to deliver similar assets at the existing club house, pool and gardens.
2. **Social Impact Assessment** - Applicant to ensure that the demographic analysis and community needs are reflected in the built form. This must respond to community feedback and is to be demonstrated in building design, dwelling diversity and common spaces for residents.
3. **CPTED Assessment** - Assessment must influence design (landscape, lighting) and operation details.
4. **Plan of management** - details for management of shared building spaces. If any commercial uses are proposed on the ground floor this should also be included.
5. **Urban Heat Impacts** - to include details of urban heat impacts and the proposed mitigation features that will improve site amenity and resident comfort. This is to include no use of synthetic turf as ground cover and provide planting & shade structures on trafficable areas of building roofs.
6. **Agreement letter** - with a registered community housing provider confirming agreement to manage affordable dwellings.
7. **Architectural plans** - that indicate that the allocation of affordable housing, demonstrating that it will be dispersed throughout the development and not concentrated to one floor or building.

4. Heritage

The Scoping Study prepared by Sutherland & Associated Planning (March 2026) is totally silent on non-Indigenous heritage values. Whilst we acknowledge the intensity of recent urban growth around the Tallawong Metro Station, this locality remains highly sensitive due to the potential visual impact on the State-significant Rouse Hill Estate which is arguably the most significant heritage asset within Blacktown LGA and is recognised as a nationally significant cultural landscape.

The current proposal, which seeks heights of up to 20 storeys in Stage 3 and 18 storeys in Stages 4 and 5, represents a substantial exceedance of existing height controls, with no clear justification provided, particularly as it is within a view corridor that was identified in a comprehensive Landscape and Visual Analysis of the Rouse Hill Estate, prepared in 2011 by LFA (Pacific) Pty Ltd for the former Department of Planning, to inform the master-planning process. That study identified key view corridors from the Estate, as illustrated in the LFA 2011 plan below.



Visual Buffer and the “Horizon View” Precedent

The 12-metre height limit established under the Area 20 Precinct Public Domain Strategy was deliberately designed to ensure development remained below the tree canopy, thereby protecting important “horizon views” from the Rouse Hill Estate.



Figure 57 Long section illustrating the Master Plan in the context of Rouse Hill House

The subject Planning Proposal will need to be supported by a Landscape and Visual Analysis to address the proposal’s inconsistencies with long-standing expert heritage and planning advice. It is noteworthy that there is a ridgeline and water reservoir between Rouse Hill Estate and the subject site which may provide some visual screening, but it is up to the applicant to demonstrate this.

Relevant references are provided below.

References

Cudgegong Road Station (Area 20 Precinct) Finalisation Report June 2015

<https://www.planning.nsw.gov.au/sites/default/files/2023-04/cudgegong-road-station-area-20-precinct-finalisation-report.pdf>

Blacktown City Council Growth Centre Precincts Development Control Plan 2010
Schedule 4 Area 20 Precinct

<https://www.planning.nsw.gov.au/sites/default/files/2023-04/schedule-4-cudgegong-road-area-20-precinct.pdf>

and Appendix 1 Public Domain and Landscape Strategy August 2011, prepared for the NSW Department of Planning & Infrastructure by LFA (Pacific) Pty Ltd

<https://www.planning.nsw.gov.au/sites/default/files/2023-04/area-20-precinct-public-domain-and-landscape-strategy.pdf>

Northwest Growth Centre: Area 20 Precinct Non-Indigenous Heritage Assessment
Revised Final Report November 2010 prepared for Department of Planning NSW by
Godden Mackay Logan

<https://www.planning.nsw.gov.au/sites/default/files/2023-04/area-20-precinct-non-indigenous-heritage-assessment-part-1.pdf>

<https://www.planning.nsw.gov.au/sites/default/files/2023-04/area-20-precinct-non-indigenous-heritage-assessment-part-2.pdf>

- Area 20 Landscape and Visual Analysis including Rouse Hill Estate Curtilage
March 2010, prepared for the NSW Department of Planning by Conybeare
Morrison International
- Area 20 Precinct Public Domain Strategy

5. Waste Management

Loading bay

The applicant must:

- demonstrate on amended plans, that the loading bay is adjacent to the bin and bulky waste storage areas.
- demonstrate on amended plans, that the designated loading bay can accommodate the entire length of the truck plus an additional 3m rear clearance for bin servicing and rotation. The truck must not overhang the loading bay hindering traffic flow onsite.
- demonstrate on amended plans, provision of physical treatment to the loading bay (e.g., lockable, removable bollards), to prevent unauthorised parking:
 - o truck turning areas must be maintained
 - o access must be coordinated by the building manager
 - o the waste management plan must be updated to this effect

Waste room design

The applicant must:

- demonstrate on amended plans, provision of separate waste rooms if a retail/commercial component is proposed in addition to the residential component. Both must be located adjacent to the loading bay.
- demonstrate on amended plans, that any doorway used to move bins and bulky waste around, is a minimum 1.5m wide to aid movement of waste bins and discarded bulky waste such as lounges and fridges.
- demonstrate on amended plans, that the bins are stored on the same level they are collected from. Basement bin storage with ground level collection is not supported due to heavy reliance on mechanical equipment to move bins around the site.
- demonstrate on amended plans, a maximum 30m walk distance for residents to carry bagged rubbish.
- demonstrate on amended plans, that resident access to the waste room is not via the loading bay where waste collection vehicles are moving and reversing. Waste collection contractors may need a second access to this space through the loading bay.
- demonstrate on amended plans, that the bin and bulky waste collection point can accommodate all the bins from the other waste rooms without impacting traffic flow onsite. Bins must not spread into the driveway area.
- demonstrate on amended plans, the correct number of waste, recycling and organics bins needed for the site considering the waste, recycling and organics generation rates below.
- demonstrate on amended plans, a waste room free from support beams, air conditioning units or other services to ensure practical and safe use of this space.
- demonstrate on amended plans, waste rooms of a regular shape. Irregularly shaped rooms are not suitable for storage of 1,100L bins or bulky waste. It also makes cleaning this area problematic.
- demonstrate on amended plans, that waste, recycling and organics bins are contained within the same storage area to encourage source separation.
- demonstrate on amended plans, a suitable, secure, enclosed and weatherproof storage area for the bin tug and trolley device for the site. It must be located adjacent to the loading bay and collection point for the site.
- clarify if the waste rooms will be accessible by residents, if so:
 - bins must not be stacked in tandem fashion as this leads to overflowing front bins, under-utilised rear bins and dumping. It is not conducive to source separation or convenient use by residents.

- bins must be positioned to allow access in between.
- update the waste management plan to reflect this.

Bulky waste storage

The applicant must:

- demonstrate on amended plans, provision of bulky waste storage at a rate of 4m² for every 40 units and 1m² for every 20 units (or part thereof) after that for items such as lounges and fridges etc:
 - the area must be located adjacent to the waste loading bay, caged and sign posted for this specific use.
 - doors must be a minimum 1.5m wide.
 - the waste management plan must be updated to this effect
- demonstrate on amended plans, bulky waste storage areas that are the correct size excluding the surface area needed for swing out of hinged doors. Roller doors may be more suitable.
- demonstrate on amended plans, that resident access to the bulky waste storage room is not via the loading bay where waste collection vehicles are moving and reversing. Waste collection contractors may need a second access to this space through the loading bay.

Generation rates

The applicant must:

- allow for the following waste and recycling generation rates for the RFBs:
 - 240L/week/unit for waste (to be collected in 1,100L bulk bins onsite)
 - 80L/week/unit for recycling (to be collected in 240L bins onsite)
- allow for the following bin capacities for the residential component:
 - 1,100L bulk bins for waste
 - 240L bins for recycling and organics
- provide for the waste and recycling generation rates listed in the EPA's Better Practice Guide for resource recovery in residential developments 2019 for each retail/commercial tenancy if any are proposed.

Collection frequencies

The applicant must:

- provide for the following waste, organics and recycling collection frequencies:
 - waste to be collected up to 3 times a week
 - organics to be collected weekly
 - recycling considered for collection once a week
- ensure that waste room design for any proposed retail/commercial component, caters for a maximum of 5 collections per week for waste, recyclables and organics.

- demonstrate on amended plans, that any retail/commercial waste rooms proposed can accommodate 3 days' worth of waste to cater for public holidays and long weekends.
- provide an indication of any proposed retail/commercial tenancies so suitable waste management needs can be determined and then accommodated.

Bin movement

The applicant must:

- demonstrate that bin transfer grades do not exceed 1:24 for 1,100L bulk bins and 1:14 for 240L bins.
- demonstrate that bin travel distances do not exceed 10m for 1100L bulk bins. If they do a bin movement aid is required for the site (e.g., bin tug with trolley)
- provide the specification sheet for the proposed equipment
- indicate on amended plans a suitable, secure storage area for this equipment (i.e., the bin tug plus the trolley attachment). It must be located adjacent to the loading bay and collection point for the site.
- indicate on amended plans, the bin travel path from the interim bin storage rooms to the main collection point using the proposed bin movement aid (bin tug and trolley).

Chutes

The applicant must:

- provide a chute system for the site. Chutes are required from 3 storeys and above.
- demonstrate on amended plans, that the chute discharge point is suitably caged (or enclosed) to prevent injury with sufficient circulation space around the equipment for bin rotation as per the manufacturer's specifications. Update the waste management plan accordingly.
- demonstrate on amended plans, that the waste chute, and organics and recycling bins on each residential floor are contained within the same room to encourage source separation. Recycling and organics bins in a separate cupboard or in foyers on each floor are not permitted.
- ensure that chutes are for waste only. We do not accept dual chutes (i.e., waste and recycling chutes, or E-diverters).
- demonstrate on amended plans, provision for the storage of 240L recycling and 240L organics bins in each waste chute room on each floor. These bins must be rotated by the building manager as required.
- demonstrate on amended plans, that the chute room on each floor is sufficient in size to hold a slot for bulk cardboard as this must not go down the chute.
- demonstrate on amended plans that the chute rooms can accommodate wheelchair access.

Truck access

The applicant must:

- demonstrate on amended plans, that ramp grades and changes of rate of grade on the ramp do not exceed 15.4% (as per AS2890.2 Tables 3.2 and 3.3).
- provide a vertical cross section plan demonstrating a 4m headroom allowance clear of eaves, overhangs, balconies, services, sprinklers and at the roller door entry point, for the trucks entire travel path. Please note, your development will also need to comply with Council's traffic requirements which may require 4.5m in accordance

with AS2890.2 for access by removalist and delivery vehicles, and emergency vehicles.

- provide a plan view showing where the section with truck access is located, and that it also cuts through the trucks travel path.
- provide swept paths for a 10.5m long, heavy rigid vehicle with a 24m turning circle for the trucks entire travel path showing forward entry and exit with all manoeuvring onsite.
- provide the AutoCAD file in DWG format and 1:1 scale for the trucks entire travel path in addition to the proposed swept paths for review.

Waste management plan

The applicant must:

- provide a waste management plan that includes:
 - type of development
 - number of units
 - number of bins for the development
 - bin collection frequencies
 - bin capacities
 - proposed service provider
 - waste and recycling generation rates for the proposed use(s)
 - location of waste collection point and loading bay
 - the proposed physical treatment of the loading bay (eg, removable, lockable bollards), to prevent unauthorised parking
 - provision of bulky waste storage, its size and location
 - information on the proposed bin tug and trolley (plus its location)
 - that access to the loading bay must be coordinated the building manager
 - specification sheet for the proposed bin tug and trolley
 - specific recipients for demolition and construction waste for reuse, recycling and/or disposal to demonstrate that waste management has been properly thought out before any activity occurs onsite

Loading dock management plan

The applicant must:

- provide a loading dock management plan that includes the following for the purpose of assessing suitability for waste collection activity in this area:
- all site users
- types of use (delivery, waste collection etc)
- hours of operation
- how the competing uses will be coordinated
- anything that relates to management of waste and collection vehicle accessing this area

