

19 June 2026

Mr Peter McManus
Department of Planning & Environment
4 Parramatta Square, 12 Darcy Street
Parramatta, NSW, 2150

Dear Peter,

Request for Industry – Specific Secretary’s Environmental Assessment Requirements | 1A Lyons Road, Drummoyne

1 Introduction

This letter has been prepared to support a request for industry-specific Secretary’s Environmental Assessment Requirements (**SEARs**) from the Department of Planning, Housing and Infrastructure (**DPHI**) in relation to a State Significant Development Application (**SSDA**) for seniors housing development at 1A Lyons Road, Drummoyne (**the site**).

This request is submitted on behalf of Scalabrini Communities Ltd (**Scalabrini**) (the Applicant) to enable the preparation of a SSDA to deliver seniors housing on the site.

This letter provides a background on the site, a summary of the proposal, an overview of the statutory context, and our understanding of the planning pathway as provided by the legislation.

The SSDA is eligible for industry-specific SEARs as:

- The proposed land use is wholly permissible.
- The proposal does not meet the threshold for designated development.
- The proposal is not a concept DA and seeks detailed consent for construction and operation on the site.

1.1 Applicant Details

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

Table 1 Applicant Details

Proponent	Details
Scalabrini Communities Limited	
Postal Address	Level 6, Suite 2, 9 Help Street, Chatswood, NSW 2067

Proponent	Details
ACN	24 000 770 598
Nominated Contact	Richard Wykes Senior Development Manager P 02 8876 6800 M 0422 226 330 richard.wykes@scalabrini.com.au

1.2 Site Description

Table 2 Site and Project Overview

Matter	Description
The Site	The site is located at 1A Lyons Road, Drummoyne (south-eastern corner of Lyons Road and St Georges Crescent). An aerial that includes the legal site description is provided at Figure 2. The site is bounded by Lyons Road (north-west), St Georges Crescent (south-west), the adjoining residential properties at 76A and 76B St Georges Crescent (south-east) and the Parramatta River (north-east).
Country	Wangal Country
Street Address	1A Lyons Road, Drummoyne
Legal Description	Lot A in DP 430837 Lot 1 in DP 442282 Lot 1 in DP 3771 Lot 2 in DP 3771 Lot 160 in DP 5279
Site Area	7,479m ²
LGA	Canada Bay LGA
Existing development	The site accommodates two primary buildings being 'Piacenza' toward the rear of the site which is four storeys in height sitting over a basement car park with uninterrupted views of the Parramatta River; and 'Como' towards the front of the site which is six storeys in height with a frontage to St Georges Crescent.

Matter	Description
	These existing buildings are currently vacant and have not been in use for the last four years. The north-eastern part of the site provides a range of outdoor communal spaces, including paved terraces and lawns. Off-street car parking is provided at two locations: 25 x car parking spaces within the basement level of 'Piacenza', which are accessible to vehicles via a ramp entry from Lyons Road. 6 x at-grade car parking spaces at the main entrance to 'Como', which are accessible via a separate point of vehicle access from Lyons Road.
Land Configuration	The site is an regular shaped allotment with an area of 7,479sqm. The site includes multiple allotments. The topography of the site is characterised by a shallow slope from St Georges Crescent towards the north-eastern (waterfront) site boundary. There is an approximate level change of 3.5m across the site between these boundaries.
Surrounding Land Use	The local context for the site is summarised below: North: The north-east site boundary presents a high-amenity waterfront interface to the Parramatta River with outlook towards Spectacle Island. The north-western site boundary adjoins Lyons Road. Low-rise residential flat buildings oppose the site from the other side of Lyons Road. East: The south-eastern site boundary adjoins the residential properties at 76A and 76B St Georges Crescent. There is a medium density housing complex known as 'Drummoyne Waters' across this adjoining property. South: Low to medium-density residential typologies are the most prominent form of development to the south of the site across St Georges Crescent. West: Low to medium-density residential typologies continue to the west of the site. The Drummoyne Village shopping centre is located further to the west approximately 400m from the site. The Drummoyne Village is bisected by the arterial of Victoria Road. Due to this, the local area is well-integrated with the regional road network.
Site Access and road network	Pedestrian and vehicular access to the site from the local road network is available from St Georges Crescent and Lyons Road.

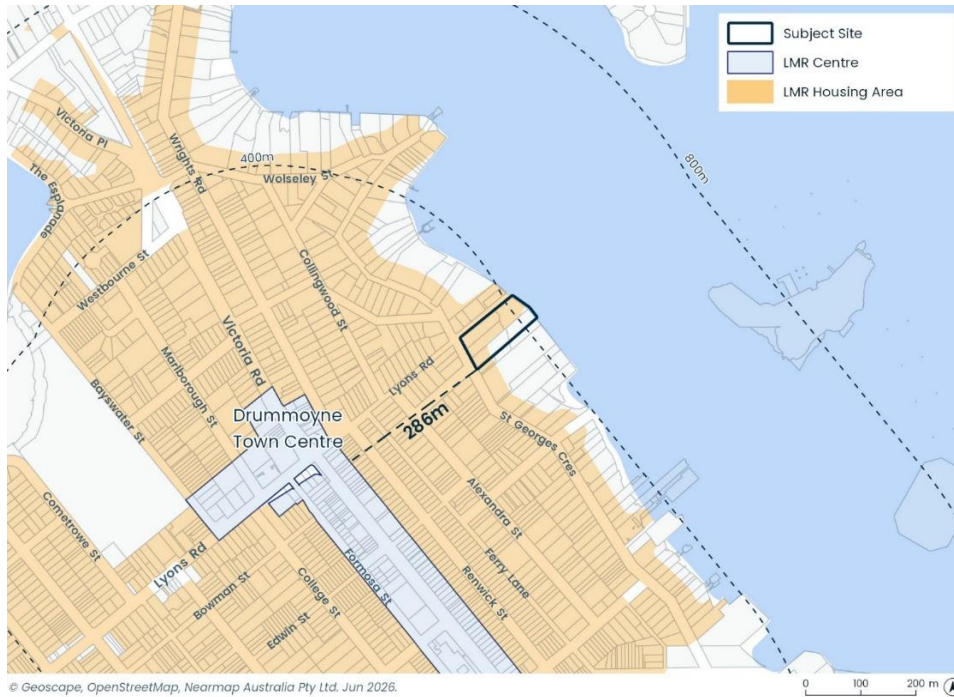
Matter	Description
Public Transport	- Bus Stops immediately to south of the site on St Georges Crescent serviced by Route 504 between Town Hall Train Station and Drummoyne. - The Drummoyne Ferry Wharf is located at the end of St Georges Crescent, 550m to the north of the site, provides ferry services to Circular Quay, Darling Harbour, and Parramatta.
Services & Utilities	The site is within an established residential area with availability to existing infrastructure and utility services
Acid Sulfate Soils	The site is subject to Class 5 and Class 2 classifications for Acid Sulfate Soils under Clause 6.1 of the CBLEP 2013.
Stormwater and Flooding	Existing stormwater infrastructure on site will be augmented to address the servicing needs of the development.
Bushfire Prone Land	The site is not located on bushfire prone land
Biodiversity	A small area of land in the northern site is located within the 'Rocky Foreshores and Seagrasses Area' under the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP) (B&C SEPP). The integrity of biodiversity values within and surrounding the site will not be compromised by the proposed development, which does not relate to the area of land concerned with the 'Rocky Foreshores and Seagrasses Area'. The site is not identified as a 'Strategic Foreshore Site' under the Biodiversity and Conservation SEPP.
Aboriginal Heritage	There are no known items of Aboriginal cultural heritage significance at the site.
Heritage	There is no item of State or local heritage significance within the immediate vicinity of the site, however the northern extent of the Birkenhead and Dawson Estates HCA straddles the opposite frontage of St Georges Crescent.

1.2.1 Site Surroundings

The site is located within 400metres north of the of the Drummoyne Town Centre, and it is mapped as Low- and Mid-Rise housing area under the LMR maps. **Figure 1** shows the location of the site in accordance with the Drummoyne Town Centre.

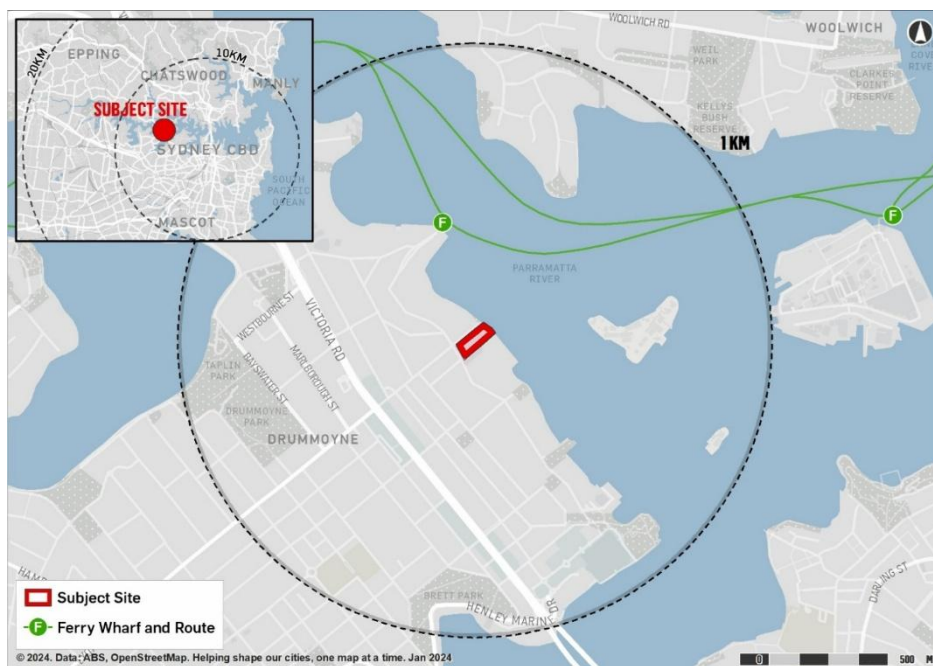
A map of the site in its regional setting is provided at **Figure 2** and the aerial photo at **Figure 3**.

Figure 1 Site Location in accordance with Drummoyne Town Centre



Source: Urbis

Figure 2 Reginal Context



Source: Urbis

Figure 3 Aerial Photo



Source: Urbis (excl. Six Maps aerial underlay)

2 Project Overview

The proposed development is for the redevelopment of the site for seniors housing accommodation. The extent of the proposed works include:

- Demolition of existing buildings and structure on the site
- Excavation and earthworks to accommodate a new basement
- Construction of two new buildings on the site (Como & Piacenza) comprising of:
 - One 6 storey building (Piacenza – closest to water) containing Independent Living Unit Apartments
 - 27 Independent Living units (ILU)
 - One 7 storey building (Como – closest to St Georges Crescent) containing Independent Living Unit Apartments
 - 24 ILUs – Missional housing (Comprising of Studio and 1 Bedroom units)
 - 40 ILUs
 - 2 Residential Care Facility (RCF) beds integrated within the Care Hub
- Roof top terraces to each building
- Associated landscaping
- Adaptive reuse of existing one storey building to a café

The proposed plans are included at **Appendix B** and shown in Error! Not a valid bookmark self-reference. and **Figure 5**.

*We note that **Misional housing** refers to faith-based, affordable, and supportive living spaces provided by the **Scalabrinians** (the Missionaries of St. Charles), specifically aimed at aiding vulnerable groups like the elderly, migrants, and refugees.*

Figure 4 Entry Level Floor Plan



Source: Jackson Teece

Figure 5 Proposed Roof Plan



Source: Jackson Teece

3 Statutory Context

The following table categorises and summarises the relevant requirements in accordance with the DPHI State Significant Development Guidelines.

Table 3 Identification of Statutory Requirements for the Project

Details	Comment
Power to grant approval	Schedule 1 (Section 28) of State Environmental Planning Policy (Planning Systems) 2021 states that development for the purposes of seniors housing (located outside of the City of Sydney) is state significant development if: (a) <i>the seniors housing component has an estimated development cost of—</i> (i) <i>for development on land in the Greater Sydney region—more than \$30 million, or</i> (ii) <i>otherwise—more than \$20 million, and</i> (b) <i>the seniors housing component includes a residential care facility, and</i> (c) <i>other components of the proposed development are not prohibited on the land under an environmental planning instrument.</i> The proposed development is located within the Greater Sydney Region (outside of the City of Sydney) and will have an estimated development cost of greater than \$30 million.

Details	Comment
	Additionally, the proposed development will include a residential care facility in the form of the specialised Care Hub, which provides: - Meals and cleaning services will be provided for site residents. Specifically, the care packages offered incorporate these services. - Both personal care and nursing care will be provided for site residents. Specifically, the care packages offered incorporate this care. - Staffing, furniture, furnishings and equipment for the provision of accommodation and care will be provided. Specifically, the care and community hub area provides the relevant staffing areas, furniture, furnishings and equipment. And no components of the proposal are prohibited. Accordingly, the proposed development is appropriately categorised as state significant development.
Permissibility	The site is zoned R3 Medium Density Residential under the <i>Canada Bay Local Environmental Plan 2013 (CBLEP 2013)</i> where all forms of residential development, including seniors' housing, are permitted with Development Consent. The definition of 'Seniors' within Clause 82 of the Housing SEPP is noted: 'Seniors' means the following people – (a) people who are at least 60 years of age, (b) people who are resident at a facility at which residential care, within the meaning of the Aged Care Act 1997 of the Commonwealth, is provided, (c) people who have been assessed as being eligible to occupy housing for aged persons provided by a social housing provider. Accordingly, development for the purposes of seniors housing is permissible on the site.
Statutory Considerations	The relevant Acts and environmental planning instruments (EPIs) relating to the site and relevant considerations for the SSDA are as follows: <i>Environmental Planning and Assessment Act 1979 (EP&A Act).</i> <i>Biodiversity Conservation Act 2016 (BC Act).</i> <i>State Environmental Planning Policy (Planning Systems) 2021</i> <i>State Environmental Planning Policy (Housing) 2021</i> <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>

Details	Comment
	- State Environmental Planning Policy (Sustainable Buildings) 2022 - Canada Bay Local Environmental Plan 2013 A full statutory assessment will be carried out against these instruments and included in the EIS.
Mandatory matters for consideration	Biodiversity Conservation Act 2016 In accordance with section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act), an SSDA is required to be accompanied by a biodiversity development assessment report (BDAR). However, a BDAR waiver may be granted should it be determined by DPHI and the DPHI Biodiversity Conservation Division that the proposed development is not likely to have any significant impact on biodiversity values.
	SEPP (Resilience and Hazards) 2021 SEPP Resilience and Hazards provide a state-wide planning approach to the remediation of contaminated land. The SEPP requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose
	State Environmental Planning Policy (Biodiversity and Conservation) 2021 Chapter 2 – Vegetation in non-rural areas Chapter 2 Vegetation in non-rural areas aims to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation Chapter 6 – Water catchments: Chapter 6 of the SEP B & C applies to the developments within Sydney Harbour catchment and the site is located by the Foreshores and Waterways area and it is identified as rocky foreshore.
Housing SEPP 2021	Chapter 3 – Part 5 – Housing for seniors and people with a disability <u>87 Additional floor space ratios</u> (1) This section applies to development for the purposes of seniors housing on land to which this Part applies if– <u>(a) development for the purposes of a residential flat building or shop top housing is permitted on the land under Chapter 5, Chapter 6 or another environmental planning instrument, or</u> (b) the development is carried out on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.

Details	Comment
	Residential flat buildings are permissible under chapter 6 of the Housing SEPP and the Canada Bay LEP 2013, therefore this clause applies to the proposed development. (2) Development consent may be granted for development to which this section applies if the site area of the development is at least 1,500m², and the development will result in a building with one or more of the following— (a) a maximum permissible floor space ratio plus— (i) for development involving independent living units—up to an additional 15% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units, or (ii) for development involving a residential care facility—up to an additional 20% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of the residential care facility, or (iii) for development involving independent living units and residential care facilities—up to an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units or a residential care facility, or both, or (b) a height of not more than 3.8m above the maximum permissible building height. Additional FSR bonus applies to the proposed development. The maximum permissible FSR under CLEP 2013 is 0.5:1, and the bonus adds an additional 25% for the use on IUL and residential Care facilities. The proposal proposes a FSR of 1.7:1.
Housing SEPP 2021	Chapter 6 – Low- and Mid-Rise Housing.
Section 163	‘Low and mid rise housing inner area’ is defined in section 163 of the Housing SEPP. The subject site is within approximately 325 metres walking distance of land identified as ‘town centre’ on the ‘Town Centres Map’. This means the subject site is within the ‘low and mid-rise housing inner area’.
Section 164	The site is not identified as bush fire prone land, within a coastal vulnerability area or a coastal wetlands and littoral rainforests area, within a TOD or deferred TOD precinct, in an ANEF or ANEC contour of 20 or greater or within the local government area identified at Section 164(1)(e) or (g).
Section 174	Development for the purpose of residential flat building is permitted with consent in the R3 Zone in which the site is located. Independent Living Units are a form of residential flat building.
Section 177	The future SSDA will consider the Tree Canopy Guide for Low- and Mid-Rise Housing, published by the Department in February 2025.

Details	Comment
Section 180	This section sets non-discretionary development standards for residential flat buildings and shop top housing in low- and mid-rise housing areas within the R3 Medium Density Residential and R4 High Density Residential zones. It establishes a maximum floor space ratio of 2.2:1, with building heights capped at 22 metres for residential flat buildings which is applicable to the proposed development.
Other approvals	No requirements for other approvals have been identified at this stage
Pre-conditions to exercise the power to grant consent	- Canada Bay LEP 2013 - State <i>Environmental Planning Policy (Housing) 2021</i>

Canada Bay LEP 2013

Key development standards

Land Use Zoning and Permissibility	The site is zoned R3 Medium Density Residential in which 'Residential Accommodation' is permissible. The Seniors Housing is a form of Residential Accommodation therefore it is permissible on the site.
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Building Height	The site has maximum height of 8.5 metres under the KLEP 2015. The proposal enables the additional 3.8 m to the allowable Height of Building in accordance with Section 87 of Housing SEPP 2021.
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Details

Comment



Floor Space Ratio

The site has FSR of **0.5:1**. The site enables the additional 25% of FSR bonus for ILU and Residential care facilities.

The bonus enables the FSR of **0.625:1**



Heritage

There is no Heritage item located on the site nor the site is located within a Heritage conservation area. However, the site is located in vicinity of the following HCAs:

- *Birkenhead and Dawson Estates Heritage Conservation Area.*
- *Drummoyne Park Heritage Conservation Area.*

Details	Comment
	

4 Key Assessment Issues

The following table outlines the key issues and impacts of the project which will be addressed in detail within the EIS. It also outlines any matters raised by the community and other stakeholders.

Table 4 Key Assessment Issues

Matter	Consideration
Connection with Country	All future development will consider the Connection to Country Framework prepared by the GANSW. The design has been informed by Country and will clearly demonstrate how the framework has been implemented and reflected in the design.
Urban Design, Public Domain and Landscaping	The SSDA will include an urban design and landscaping report, demonstrating that the proposal responds to site opportunities and constraints and is of a high quality and landscape led design. The project aims to provide a high-quality landscaped outcome on the site. The Urban Design will be informed by Country and will reflect and embed the recommendations of the appointed cultural advisor to address the Connection with Country framework.
Amenity	The SSDA will need to address key environmental amenity matters to ensure the project can provide a high-quality outcome with strong liveability attributes. Key technical studies to inform the EIS will (if required) include overshadowing diagrams; noise and vibration impact assessment; visual impact assessment; and landscape strategy.
Noise & Vibration	A Noise and Vibration Impact Assessment (NVIA) will accompany the assessment of noise and vibration matters in the EIS. Mitigation, management, and monitoring measures will be documented and implemented over the demolition, construction, and operation of the site

Matter	Consideration
Visual	Visual impact will be assessed in detail in the EIS. As a part of this, impacts on viewpoints and vistas will be assessed as well as visual amenity assessment of landscaping, design and supporting works.
Access	An access report will be prepared for the development to ensure that disabled access can be provided. The access report will demonstrate how access for all users is addressed through the development.
Transport	A Traffic Impact Assessment (TIA) to assess key traffic considerations in relation to the site and its development will be obtained and evaluated in the EIS. Existing and estimated future traffic conditions, parking, and access as well as the impact on surrounding road capacity and pedestrian/cycling routes are all key features to be analysed.
Water and Flooding	Analysis of the site's water and stormwater conditions will be included in the civil infrastructure report and plans.
Land Contamination	The suitability of the site in terms of existing contamination, to undergo the proposed development is expected to be appropriate. A Preliminary Site Investigation (PSI), Hazardous Buildings Material Survey, and a Salinity Investigation will be prepared as required. Any necessary further investigation will be conducted and explored in the EIS.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation.
Waste	The proposed development is expected to generate waste during the demolition, construction, and operation phases. A Waste Management Plan (WMP) will be prepared to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation.
Biodiversity	The site currently consists of trees and vegetation associated with the existing residential dwellings. A BDAR Waiver request will be prepared for the proposal. An Arboricultural Impact Assessment will be undertaken to assess the value of existing trees on the site that are proposed to be removed to facilitate the development, and management measures for those trees proposed to be retained.
Heritage	As mentioned earlier the development at 1 Maclaurin Parade is a Local significant Heritage Item (1107-“Killiecrankie”, dwelling house), a Heritage Impact Assessment will be prepared to investigate the cumulative impacts of the proposal on the heritage significance of the development.

Matter	Consideration
Social Impact & CPTED	A Social Impact Assessment (SIA) will be prepared that will assess the social impacts of the project, including social consequences and associated mitigation measures, as well as social benefits.
ESD	An Ecologically Sustainable Development (ESD) Report will be prepared to provide a sustainability assessment of the development. The ESD Report will assess the building design and identify measures through which the development can achieve best practice outcomes and compliance with relevant sustainability requirements.

5 Engagement

Early engagement will be undertaken with the community and relevant agencies to provide information about the proposal and to obtain feedback. Community engagement will be led by a specialised engagement consultant with a range of activities to occur prior to lodgement.

6 Staging

The following program is proposed for the SSDA:

- Scoping meeting: June 2026
- SEARs request issued: June 2026
- Lodgement for Test of Adequacy Review: November 2026
- Formal lodgement: November 2026

7 Conclusion

This letter has outlined preliminary information regarding the proposed development at 1A Lyons Road, Drummoyne. The report has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project. As outlined in **Section 3.0**, the Proposal is declared State Significant Development under Schedule 1, under Schedule 1, (Section 28) of *State Environmental Planning Policy (Planning Systems) 2021*. We trust that the information detailed in this report is sufficient to enable the Secretary to issue SEARs for the preparation of an Environmental Impact Statement.

Kind regards,

A handwritten signature in blue ink, appearing to read "Belinda Thomas".

Belinda Thomas
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