

11 October 2024

2230814

Kiersten Fishburn  
Secretary  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square, 12 Darcy Street,  
Parramatta NSW 2150

Dear Ms Fishburn,

**RE: REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS: LOTS BOUND BY VICTORIA ROAD, SYDENHAM ROAD, FARR STREET, AND MITCHELL STREET, MARRICKVILLE, NSW 2204**

The letter has been prepared by Ethos Urban on behalf of Rent-to-Live Co. (RTL Co.) (the Proponent) to request project-specific Secretary's Environmental Assessment Requirements (SEARs) from the Department of Planning, Housing and Infrastructure (DPHI) for a rental housing precinct development comprising Build to Rent housing (BTR), co-living housing, affordable housing, retail and public and private recreation area. The precinct development is known as *The Timberyards*.

Project-specific SEARs are requested in order to enable and guide the preparation of an Environmental Impact Statement (EIS) for the purposes of a State Significant Development Application (SSDA).

To support the request for SEARs, this letter provides an overview of the site and proposal, as well as the relevant planning context, and identifies the key likely environmental and planning considerations associated with the proposal. It should be read in conjunction with the following documents appended to the letter:

- Architectural Concept Plans prepared by Turner (**Attachment A**); and
- Cost Estimate Report prepared by WT Partnership (**Attachment B**).

## Applicant Details

The Applicant's details are presented in **Table 1** below.

**Table 1** Applicant Details

<b>Applicant:</b>	The Trustee for RTL Marrickville Property Trust (RTL Co.)
<b>Address:</b>	Level 14, 275 George St, Sydney NSW 2000
<b>ABN:</b>	94 620 640 148

## Site and Surrounding Context

The site comprises a group of adjacent lots identified in **Table 2** below, within the Inner West Council Local Government Area (LGA). The site is located within Precinct 47: Victoria Road in the MDCP 2011. The site is primarily contained in the Timber Yards sub-precinct of Precinct 47, the lots facing Victoria Road falling within the Victoria Road Corridor sub-precinct. The site is approximately 22,333m<sup>2</sup> in area (excluding the Victoria Road widening area).

The site currently comprises primarily industrial and light industrial uses, with residential dwellings to a minor portion of the site on Farr Street (western boundary) and Victoria Road (eastern boundary), see site aerial map in **Figure 2**.

The surrounding context comprises a mix of 1-2 storey showroom and light industrial buildings, 1-2 storey residential dwellings, Wicks Park and a new 12 storey mixed-use development (Wicks Place) to east on the opposite side of Victoria Road. Sydenham Railway Station, with recently opened Sydenham Metro Station, is located approximately 800m to the southeast of the site, refer site context map in **Figure 1**.

**Table 2** Legal identification of lots included in the subject site

Lot/DP	Property Address	Lot/DP	Property Address
1/724487	119A Sydenham Rd	1/572829	35 Farr St
1/972534	121 Sydenham Rd	12/4590	14 Mitchell St
B/439802	129 Sydenham Rd	13/4590	10 Mitchell St
A/439802	131 Sydenham Rd	14/4590	8 Mitchell St
D/377270	133 Sydenham Rd	15/4590	183 Victoria Rd
1/700223	135 Sydenham Rd	16/4590	4 Mitchell St
B/343286	7 Farr St	17/4590	2 Mitchell St
A/304426	9 Farr St	3/4590	165 Victoria Rd
A/304426	11 Farr St	2/4590	167 Victoria Rd
1/78883	13 Farr St	1/4590	169 Victoria Rd
1/252507	15 Farr St	A/301985	171 Victoria Rd
2/252507	17 Farr St	B/301985	173 Victoria Rd
3/252507	19 Farr St	C/301985	175 Victoria Rd
4/252507	21 Farr St	D/301985	183 Victoria Rd
5/252507	23 Farr St	E/301985	175 Victoria Rd
6/252507	25 Farr St	A/166330	183 Victoria Rd
7/252507	27 Farr St	20/667441	183 Victoria Rd
8/252507	29 Farr St	1/315293	183 Victoria Rd
9/252507	31 Farr St	345/587262	191 Victoria Rd
1/583801	33 Farr St		



- The site
- Sydenham Train and Metro Station
- Marrickville Train Station

**Figure 1 Site Context Map**

Source: Nearmap, Ethos Urban



- The site

**Figure 2 Site Aerial Map**

Source: Nearmap, Ethos Urban

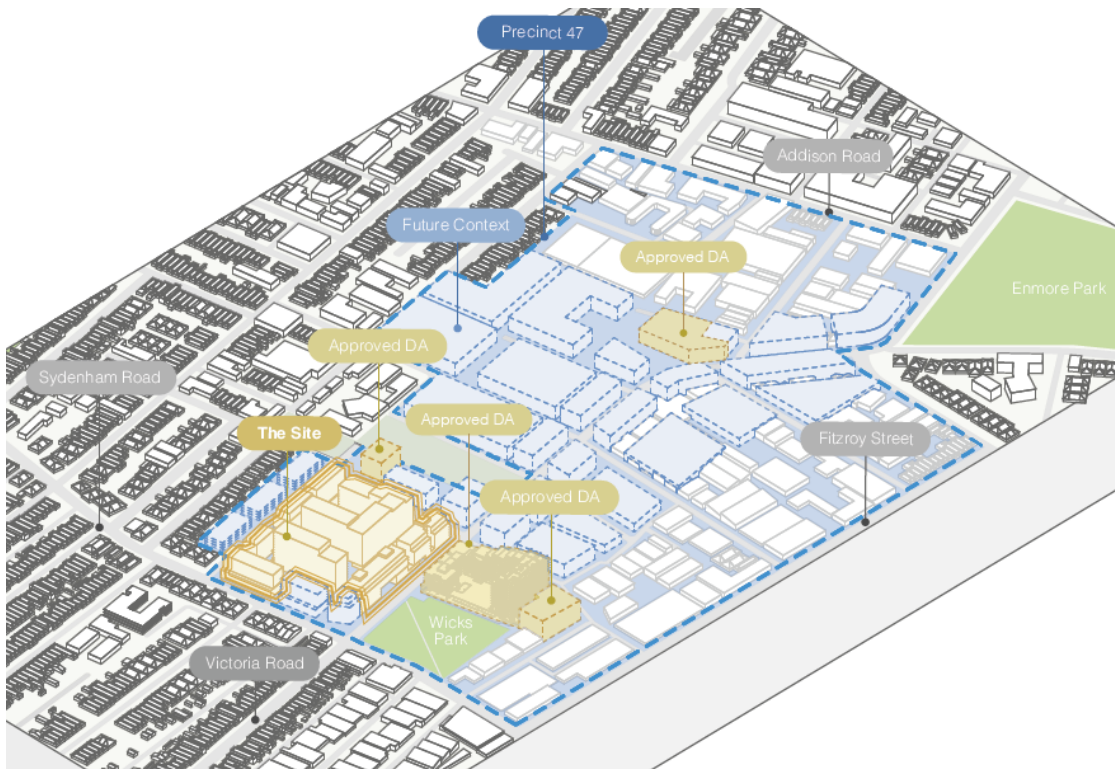
## Prior rezoning to facilitate the proposed development

The site forms a key part of the Victoria Road Precinct, which is identified as Precinct 47 (**Figure 3**) under the Marrickville DCP. The Victoria Road Precinct was the subject of a Planning Proposal that was lodged with (then) Marrickville Council in August 2015. The objectives of the Planning Proposal was to:

- provide a 15 to 20-year strategic plan for Precinct 47;
- maintain and grow employment within the precinct;
- provide a broader mix of businesses that better meet the local employment profile and changing demographics of the Marrickville LGA whilst ensuring that new development does not directly compete with existing retail centres;
- incorporate medium to high-density residential development along the Victoria Road strategic bus corridor where appropriate;
- ensure that all new development achieves compliance with standards for internal acoustic amenity;
- create a vibrant hub for Marrickville's burgeoning creative industries that complements the existing arts and cultural premises in the precinct.
- facilitate improvements to permeability, streetscapes and amenity within the precinct;
- facilitate continuation of industrial, warehousing and other business uses;
- ensure appropriate interfaces between the precinct, surrounding residential and industrial areas;
- create unique retail experiences that do not compete with established retail along Marrickville Road and at Marrickville Metro by providing an opportunity to build on the precinct's existing home renovation showrooms and cafes.

Following an extensive negotiation process, the *Marrickville Local Environmental Plan 2011* (Amendment No.14), reflecting the final Planning Proposal, was gazetted in December 2017. The precinct specific Development Control Plan amendment, prepared concurrently with the Planning Proposal, was then adopted by Inner West Council on 26 September 2018.

The site is therefore the subject of a relatively recent and prescriptive set of planning controls that have been tailored to deliver the intended outcomes for the Precinct. Four (4) development applications have been approved since gazettal of the LEP amendment and adoption of the DCP in 2018, these being the Rich Street Creative Industries Hub, the mixed-use development known as 'Wicks Place', a new non-residential development at Faversham Street and more recently a six (6) storey residential flat development at 37-47 Farr Street.



**Figure 3** Precinct 47

Source: Turner

## Proposal Overview

The proposed SSDA will seek approval for a rental housing precinct development comprising Build to Rent housing (BTR), co-living housing, affordable housing retail and public and private recreation area. The proposal is anticipated to include the following key components:

- Demolition and site preparation works;
- Construction of 7 buildings ranging from 8 to 13 storeys;
- Construction of a basement car park, plant and storage areas with primary access from Mitchell Street;
- 488 BTR apartments;
- 111 affordable apartments;
- 591 co-living dwellings;
- 2,057m<sup>2</sup> of retail floor space;
- Communal areas for residents on site;
- Landscaping, publicly accessible open space, and communal open space; and
- Extension and augmentation of infrastructure and services as required.

An extract of the proposed concept architectural set is provided at **Figure 4**.



**Figure 4** Proposed massing and primary use locations

Source: Turner

**RTL Co. aim to deliver Sydney's premier neo-industrial residential neighbourhood - a global benchmark for imaginative urbanism. This development, called the Timberyards, aims to seamlessly integrate diverse residential offerings into the distinctive character of Marrickville, fostering a sense of pride among residents and the local community. The project will deliver a wide range of rental living solutions, complemented by recreation spaces and local retail, all underpinned by Connection to Country and environmentally sustainable design principles.**

**RTL Co. has engaged a diverse team of Australia's leading architects and designers to ensure design excellence is achieved. Our collaborators include Turner, Tribe Studio, ArchitectureAND, Aileen Sage, Atelier Ten, Yerrabingin, Matthew Pullinger, RIOS and Arcadia.**

**The Timberyards boasts excellent walkability to the newly opened Sydney Metro City line at Sydenham Station, offering a 7-minute journey to Sydney's CBD. This project is fully funded and pending planning approval, RTL Co. is able to commence immediately to assist with the NSW Government's target of achieving well-located residential housing supply.**

## Statutory Planning Considerations

The relevant statutory considerations at this stage of the project, including eligibility for the SSD and project-specific SEARs pathways are outlined in **Table 3** below.

**Table 3** Statutory Planning Considerations

Component	Assessment
SSD Qualification	<p>Development for the purposes of BTR Housing with an Estimated Development Cost (EDC) of more than \$50 million in the Greater Sydney Region, with the tenanted component comprising at least 60% of the EDC, is state significant development under Schedule 1, Section 27 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP).</p> <p>The proposed works have an EDC exceeding \$50 million with more than 60% dedicated for the purpose of Build to Rent housing, and therefore, the development is considered state significant (refer to the Cost Estimate Report at <b>Attachment B</b>).</p>
Permissibility	<p>Under the <i>Inner West Local Environmental Plan 2022</i> (IWLEP 2022), the majority of the site is zoned R4 High Density Residential, with MU1 Mixed Use zoned land to the portion of the site fronting Victoria Road.</p> <p><u>R4 Zoned Land</u></p> <ul style="list-style-type: none"> <li><i>Residential Flat Building</i> is a permitted use in the R4 zone and is a type of residential accommodation that can be used for BTR housing pursuant of section 72 of the Housing SEPP.</li> <li><i>Co-living</i>, being a type of residential accommodation not listed as permitted, is prohibited in the R4 zone. However, the Housing SEPP Section 67 makes co-living a permitted use in a zone that permits residential flat buildings.</li> <li><i>Recreation area</i> is a permitted use in the R4 zone (the pocket park).</li> </ul> <p><u>MU1 Zoned Land</u></p> <ul style="list-style-type: none"> <li><i>Shop Top Housing</i> is a permitted use in the MU1 zoned land.</li> <li><i>Co-living</i>, being a type of residential accommodation not listed as permitted, is prohibited in the MU1 zone. However, the Housing SEPP Section 67 makes co-living a permissible use in a zone that permits shop top housing.</li> <li>Commercial premises (retail) is a permitted use in the MU1 zone.</li> </ul> <p><u>Development Near Zone Boundaries</u></p> <ul style="list-style-type: none"> <li>Clause 5.3 of the IWLEP 2022 enables a permitted use in an adjacent zone to be permitted in the subject zone, for a maximum of 25 metres from the boundary of the two zones, where demonstrated to enable a more logical and appropriate development of the site and be compatible with the planning objectives and land uses for the adjoining zone. The proposal seeks to extend the ground floor retail in the MU1 zone into the R4 zone for maximum 25 metres.</li> </ul>

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## Key Development Standards

### 4.3 Height of Buildings

The site is mapped with the following maximum heights of buildings:

- Sydenham Road – 11m
- Farr Street – 20m
- Victoria Road – 23m
- Central part of the site – RL50m

As the proposed development comprises 10% affordable housing, section 16 of the Housing SEPP applies and 20% additional height can be applied to any part of the proposal comprising a residential flat building or shop top housing. It is noted that the central part of the site is restricted by the OLS. The resulting maximum heights inclusive of the height bonus are:

- Sydenham Road – 13.2m
- Farr Street – 24m
- Victoria Road – 27.6m
- Central site – RL50m (no change)

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### 4.4 Floor Space Ratio

The site, with the exception of the land identified for the widening of Victoria Road, is mapped with a maximum FSR of 3:1

As the proposed development comprises 10% affordable housing, section 16 of the Housing SEPP applies and 20% additional floor space applies. The resulting maximum FSR is 3.6:1.

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### 4.6 Exceptions to development standards

As the central part of the site is restricted in height, additional floor space is unable to be achieved in this zone, which is necessary to deliver affordable housing. The additional floor space is therefore proposed to be redistributed to the perimeter of the site, where it can be accommodated. This redistribution of floorspace results in an exceedance to the LEP + 20% height and the achievement of 10% affordable housing.

The application will therefore be accompanied by a clause 4.6 Variation Request, outlining this redistribution strategy and with comparison of the environmental impact that would otherwise result from a compliant scheme.

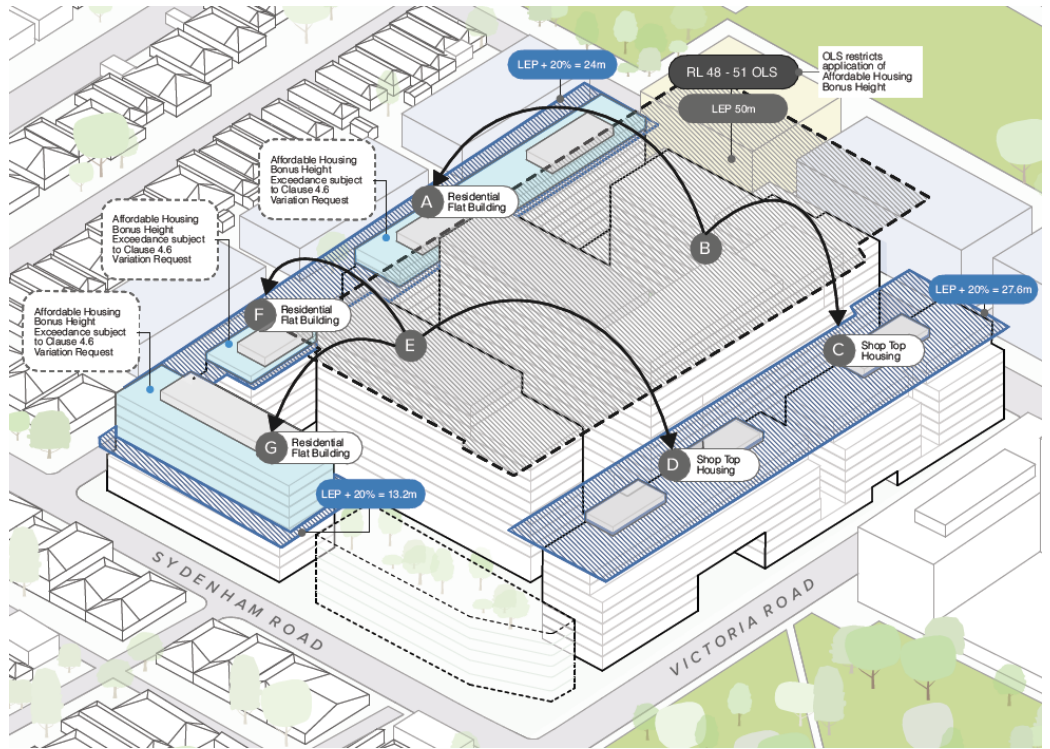
The applicant met with DPHI in early 2024 to discuss the clause 4.6 rationale, appreciating the site-specific circumstances of the case. Following this meeting, the applicant received the below guidance:

*The Department would consider any 4.6 variation request in accordance with the Guide to Varying Development Standards and the In-fill Affordable Housing Practice Note. Any 4.6 variation request made with respect to the site should be informed by meaningful and effective engagement with both Inner West Council and other relevant agencies including CASA and AirServices, who may provide advice on the feasibility (or confirm the unfeasibility) of accommodating development within the OLS.*

The clause 4.6 Variation Request will address the guidance noted by DPHI above. Further, the 4.6 Variation Request will address current and relevant planning reform that may be in force prior to lodgement, including the Low- and mid-rise housing policy (LMRH). The LMRH reform would potentially apply to the site as it fully within 400m walking distance of land zoned E1 Local Centre and the nearby E1 zone contains a wide range of frequently needed goods and services such as full line supermarkets, shops and restaurants. As such, the shortest maximum height on the site (11m at Sydenham Road) may be increased to 21m as per the Explanation of Intended Effect (EIE). The height to the land adjacent Farr Street would also increase from 20 to 21m. This reform would therefore substantially reduce the exceedance to be addressed in the Variation Request.

Further detail is provided at **Attachment A** and illustrated below.

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### 5.10 Heritage Conservation

The site is not located in a Heritage Conservation Area nor does the site contain any items of heritage value. Nearby to the site are two local heritage items:

- I1218 Marrickville Public School, including interiors
- I1281 Victorian Italianate style mansion – “Lauraville”, including interiors (2 Thompson Street)

### 5.21 Flood planning

The site is flood affected, discussed further below.

### 5.3 Development near zone boundaries

The proposed development exercises use of this clause for the ground floor retail, which enables a permissible use in an adjacent zone to also be permissible in the subject zone, for a maximum of 25 metres from the boundary of the two zones.

The application will demonstrate that the development is not inconsistent with the objectives for development in both zones, and the carrying out of the development is desirable due to compatible land use planning, infrastructure capacity and other planning principles relating to the efficient and timely development of land.

### 6.7 Airspace Operations

- Development consent must not be granted to development that is a controlled activity within the meaning of the *Airports Act 1996* (Airports Act) of the Commonwealth, Part 12, Division 4, unless the applicant has obtained approval for the controlled activity under regulations made for the purposes of that Division.
- Construction of a building is a controlled activity under the Airports Act and as such any building on the site applying the maximum height/storey control will require written approval from the Sydney Airport Corporation (SACL).
- The PANS- OPS surface appears to be approximately RL50 – RL53m across the site. The proposal does not seek height above the LEP mapped height of RL50.

### 6.8 Development in areas subject to aircraft noise

The development will meet the indoor design sound levels shown in Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) in AS 2021:2015, given that the site is in an ANEF contour of approximately 25-30 and the development involves the erection of a new building.

### 6.9 Design excellence

The development will seek to demonstrate design excellence as it will be greater than 14 metres in height.

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### 6.13 Residential accommodation in Zones E1, E2 and MU1

The portion of development within the MU1 zoned land will be mixed use (shop top housing), have an active frontage and demonstrate compatibility with the desired character of the area (bulk, form, use, scale).

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### 6.31 Development on certain land at Victoria Road, Marrickville

The site is within Key Site Area 13, which references IWLEP 2022 clause 6.31. This clause requires that a DCP is prepared for the subject area prior to granting development consent for a proposal on that land. We note that the MDCP 2011 was amended to include Section 9.47 Victoria Road, dated November 2019, and thus this requirement has been satisfied.

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#### **Pre-conditions to exercise the power to grant consent**

- *Inner West Local Environmental Plan 2022 (IWLEP 2022)*
  - *State Environmental Planning Policy (Resilience and Hazards) 2021*
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#### **Mandatory matters for consideration**

- *State Environmental Planning Policy (Housing) 2021*
  - *State Environmental Planning Policy (Planning Systems) 2021*
  - *State Environmental Planning Policy (Transport and Infrastructure) 2021*
  - *State Environmental Planning Policy (Resilience and Hazards) 2021*
  - *State Environmental Planning Policy (Sustainable Buildings) 2022*
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#### **Site isolation**

The proponent has not yet acquired the lots adjoining the site to the south (at corner of Sydenham and Victoria Roads). Notwithstanding this, the application will address the site isolation planning principle *Karavellas v Sutherland Shire Council [2004] NSWLEC 251* and demonstrate that the adjoining lots can be independently developed as per the relevant planning controls.

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## **Engagement**

To date, the proponent has undertaken engagement with the following stakeholders:

- Department of Planning, Housing, and Infrastructure (DPHI): meetings on 23 February and 6 March 2024, supplemented by ongoing correspondence.
- Government Architect NSW - State Design Review Panel (SDRP): meeting on 5 September 2024
- Meetings with DPHI and Transport for NSW (TfNSW), receiving confirmation that the proposed scheme presents change to requirements to upgrade the adjacent intersection.

Further engagement will be undertaken as the proposal progresses (including further SDRP meeting(s)), which will be conducted in accordance with the *Undertaking Engagement Guidelines for State Significant Projects (2021)*. The proponent will undertake engagement with the following stakeholders throughout the SSDA process (as required):

- Inner West Council;
- First Nations Stakeholders;
- Relevant service providers; and
- Local Community and Action Groups.

The SSDA process will provide further opportunities for community input and for the proponent to respond to any issues raised. The project team remains committed to continuing dialogue with the relevant stakeholders and agencies throughout the development assessment process.

## Cumulative Impacts

Marrickville's Precinct 47 is currently undergoing significant urban renewal and change in line with the preceding Precinct 47 LEP amendment and amended Marrickville DCP. The nature of proposed development has thus been anticipated and supported through the Planning Proposal process. Notwithstanding this, the proposed rental housing precinct presents significantly improved outcomes when compared to the originally anticipated high density build to sell development on the site. This includes a significantly reduced traffic impact (less parking on site) and a highly permeable, public-embracing ground plane. The applicant has liaised with TfNSW and received confirmation that the proposed scheme presents change to requirements to upgrade the adjacent intersection.

It is intended that any cumulative impacts of the proposal will be mitigated through design and will be addressed in further detail in the EIS.

## Matters Requiring Further Assessment in EIS

This section provides a high-level assessment of impacts anticipated to be associated within the proposal, the key matters requiring further assessment in the EIS and the proposed approach to assessing each of the matters. The purpose of considering these factors at this stage is to inform the preparation of any additional assessment requirements beyond the Project Specific SEARs.

### Transport and Traffic

The EIS will be informed by a Traffic Impact Assessment and Green Travel Plan, which will be carried out to demonstrate both construction and operational traffic on the existing and future road network, as well as the functionality of the access road off Mitchell Street as the primary vehicular access point in the context of the site and the surrounding development.

Traffic analysis was carried out as part of the site's rezoning and demonstrated that the local road network could accommodate the additional traffic movements generated by the redevelopment of the Victoria Road Precinct. Notwithstanding this, the proposed rental housing precinct will generate significantly less traffic than the anticipated build to sell development. This will greatly reduce the anticipated increased demand on the existing street network, improving its level of service. Further, given the target demographic and reduced parking quantum, trips to and from the site will be weighted towards public transport and active transport rather than private vehicular use.

The site is very well serviced by public transport, with Marrickville Station, Sydenham Station (including the new Metro station) and bus stops (including bus stops in immediate proximity to the site on Victoria Road at corner of Chapel Street to the north and Sydenham Road to the south).

### Contamination

Given the historical and current use of the site for industrial and warehouse purposes, and as the site is affected by three classes of Acid Sulfate Soils – Class 2, 4 and 5, a detailed site investigation (DSI) will accompany the application, and, if required, a remediation action plan (RAP).

### Flooding

The site is identified in Council's mapping as being flood affected. A Flood Impact Assessment will accompany the application, demonstrating by way of flood modelling that the development of the site (including earthworks, fill, and construction of buildings) does not impede the passage of floodwater or cause a rise (afflux) in the flood level upstream or downstream, and/or increase the velocities of flood water flow.

### Aircraft Operation and Noise

An acoustic assessment will accompany the application, demonstrating that the proposal is designed to meet the internal acoustic requirements of buildings in areas affected by aircraft noise, which require higher specification of building fabric.

### Biodiversity

A BDAR Waiver will be submitted to meet the requirements of Section 7.9 of the *Biodiversity Conservation Act 2016*. The development will not generate significant impacts on biodiversity values given the site at present is currently devoid of significant vegetation.

## Public Infrastructure and Public Domain

The site is planned to include publicly accessible open space. The EIS will consider the proposal's interface with both the internal publicly accessible open space and the public domain to the relevant street frontages, including Victoria Road, Sydenham Road, Farr Street and Mitchell Street, and pedestrian connections to the Victoria Road Precinct.

Key technical studies relevant to the public domain that will inform the EIS will include:

- Urban Design Report; and
- Architectural Plans.

## Built form and urban design

The proposed development will seek to demonstrate design excellence pursuant to clause 6.9 of the IWLEP 2022. The SSDA will be prepared by collaborating architects and related design specialists that will collectively prepare supporting material in relation to:

- Connecting with Country;
- Improvements to the quality and amenity of the public domain, including landscape design;
- Architectural design, materials and detailing appropriate to the building type and location;
- The relationship of the development with existing and proposed development on neighbouring sites in terms of separation, setbacks, amenity and urban form;
- Bulk, massing and modulation of buildings;
- Environmental impacts, including sustainable design, overshadowing, wind and reflectivity and visual and acoustic privacy;
- The achievement of the principles of ecologically sustainable development; and
- Pedestrian, cycle, vehicular and service access, circulation and requirements, including pedestrian permeability.

## Economic Benefit Assessment

### Economic Modelling Approach

Ethos Urban has measured the estimated economic benefits of the proposed development in terms of the total construction and operational phase benefits.

The primary way to measure a development or operational business's economic footprint is to estimate its contribution to economic activity through value added and employment. The employment and value added estimates outlined in this report flow from Ethos Urban's proprietary input-output (IO) model. This IO model is based on ABS National Accounts data and has been developed to comply with best practice guidelines using the Simple Multiplier effect.

The Simple Multiplier estimates the expansion of other industries required to support the initial (direct) increase in the original industry; and does not include the additional impacts of extra wages and employment income being spent across the economy (spill-over effects). Use of the Simple Multiplier effect measure is in-line with best practice industry standards and reflects a conservative position.

Results from the modelling should be interpreted as indicative of the potential impact the project will have on the Australian economy.

The modelling provides estimates of the following economic benefits as a result of the project:

- **Construction Employment (job years)** – the direct (onsite) and indirect (flow-on) full-time equivalent (FTE) job years supported over the construction period.
  - 'Job-years' is defined as the number of full-time equivalent (FTE) jobs supported over the construction period. i.e. if construction is over 10 years, 100 job-years is equivalent to 10 FTE jobs per year.
- **Ongoing Employment** – the direct and indirect FTE jobs supported by the ongoing operations of activities of the proposed development once developed.

Estimates of the economic benefits of the proposed development will be realised across the national economy. Given the scale and diversity of the NSW economy, a significant proportion of these benefits will be realised locally.

## Construction Phase

Based on direct construction costs identified in **Attachment B** (prepared by WT Partnership), the construction phase is expected to directly support employment of 750 job-years. When the multipliers are considered, total state-wide economy effects over the construction program for the proposed development are forecast to be FTE employment of 3,250 job-years.

**Table 4 Construction Phase Economic Benefits (spread over construction period)**

Category	Direct	Indirect	Total
Employment (FTE job-years)	750	2,500	3,250

Source: ABS, National Accounts 2020/21; ABS; Ethos Urban Job-years - Number of FTE jobs supported over the construction period. i.e. if construction is over 10 years, 100 job-years is equivalent to 10 FTE jobs per year.

## Operational Phase

Economic impacts associated with the proposed development, once complete and fully occupied, are based on supportable employment estimates for the various uses incorporated in the proposed development scheme.

These estimates have been prepared with reference to the City of Sydney Floor Space and Employment Survey, NSW 2022 Common Planning Assumptions (CPA) and Ethos Urban research. The following ratios have been applied to the proposed SSDA:

- Build to Rent and Co-Living –1 worker per 50 dwellings/rooms
- Retail – 1 worker per 30.2m<sup>2</sup> of retail floorspace.

Note that a GFA to GLA efficiency ratio of 80% has been applied to non-residential floor areas.

Based on the above, the proposed development is estimated **support 160 FTE jobs**, inclusive of 90 direct FTE workers. This indicates that a further 70 FTE jobs would supported through indirect supply chain effects.

**Table 5 Operational Phase Economic Benefits (Annual)**

Category	Direct	Indirect	Total
Employment (FTE)	90	70	160

Source: ABS, National Accounts 2020/21; ABS; Ethos Urban

## Other issues for consideration and assessment

The following project-specific SEARs matters will be considered as part of the EIS. Where a matter is listed in the project-specific SEARs, but is not relevant to the site, this has been shown **struck through**:

- Statutory Context;
- Capital Investment Value and Employment;
- Design Quality;
- Built Form and Urban Design [this will include BCA and Accessibility (DDA) reports];
- Environmental Amenity;
- Visual Impact;
- Public Space [this will include a wind assessment];
- Trees and Landscaping;
- Ecological Sustainable Development;
- Traffic, Transport and Accessibility;
- **Biodiversity** [site does not have capacity for biodiversity impact and a Biodiversity Waiver will be lodged];
- Noise and Vibration;
- Ground and Water Conditions;
- Water Management;
- Flooding Risk;
- Contamination and Remediation;
- Waste Management;
- Aboriginal Cultural Heritage;

- Environmental Heritage [noting however that the site does not contain or is adjacent to an item of environmental heritage or is within a HCA];
- Social Impact;
- Infrastructure Requirements and Utilities;
- **Bush Fire Risk** [site does not have capacity to be at risk of bushfire];
- Aviation;
- Construction, Operation and Staging;
- Contributions and Public Benefit; and
- Engagement.

## Conclusion

As outlined in this letter, the Proposal is declared SSD under Schedule 1, Section 27 of the Planning Systems SEPP and is eligible for project-specific SEARs.

This letter has outlined the preliminary information regarding the site, project, the strategic and statutory context and planned and ongoing stakeholder engagement, which will permit DPHI and other relevant government agencies to issue SEARs.

We trust that the information provided is sufficient to enable the Secretary to issue SEARs for the preparation of the EIS. Should you have any queries about this matter, please do not hesitate to contact the undersigned.

Yours sincerely,



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