

02 May 2025

Amy Watson Director, Affordable Housing Assessments Department of Planning, Housing and Infrastructure Locked Bag 5022 Parramatta, NSW, 2124

Dear Amy,

# State Significant Development Application (SSDA) - Request for Industry Specific Housing SEARs – 21, 23, and 25 McIntosh Street, and 55 Werona Avenue, Gordon

On behalf of our client, CPDM, this letter is issued to the Department of Planning, Housing and Infrastructure (the Department) as a formal request for Secretary Environmental Assessment Requirements (SEARs) for a proposed residential flat building development (including in-fill affordable housing) at 21, 23, and 25 McIntosh Street, and 55 Werona Avenue, Gordon. The site is within a transport-oriented development (TOD) area.

The following documents have been prepared to accompany this SEARs request:

- Appendix 1 Architectural Scoping Report, prepared by PMDL
- Appendix 2- Preliminary Estimated Development Cost Letter, prepared by Mitchell Brandtman
- Appendix 3 Survey Plan, prepared by Burton & Field

### Summary of development application

#### Proponent details

The Proponent details are as follows:

Proponent name	СРОМ
ACN	662 647 001
Address	Suite G02, 22 Atchinson Street, St. Leonards 2065

Site context

The site is located at 21, 23, and 25 McIntosh Street, and 55 Werona Avenue, Gordon and located within the Ku-ring-gai local government are (LGA). The site consists of four individual lots, with a total area of approximately 7,776 sqm. All four properties are currently occupied with dwelling houses and associated development such as swimming pools, tennis court and gardens. The site is rectangular in shape with the main frontage to McIntosh Street, a secondary access to the site is provided via an access handle to 55 Werona Avenue.

The site is located on the northern side of the North Shore Railway Line and within walking distance (400m metres southeast) of the entrance to the Gordon Railway Station.

An aerial image of the site is provided in Figure 1.



Figure 1 Aerial photo of the site, outlined in red (Source: Nearmap)

Address	Lot	Area
21 McIntosh Street	Lot A in DP 339345	1,394 sqm
23 McIntosh Street	Lot 5 in DP 651557	1,390 sqm
25 McIntosh Street	Lot 1 in DP 167505	1,223 sqm
55 Werona Avenue	Lot 11 in DP 1078667	3,769 sqm

The legal description of the lots is provided in the table below.

#### Confirmation of the site's location

The site is defined as being a Transport Oriented Development Area on the Transport Oriented Development Sites Map in accordance with Chapter 5 of the Housing SEPP. As demonstrated in the figure below, as the site is within a 400m walking distance to Gordon Railway Station it is also defined as being an 'accessible area' in accordance with schedule 10 of *State Environmental Planning Policy (Housing)* 2021 (Housing SEPP).



Figure 2 Confirmation site is within an accessible area (Source: Google Maps)

#### **Planning history**

As of 30 April 2025, there are no relevant approvals or applications applying to the land on Council's DA tracker, Planning Panel tracker or Major Projects.

#### Description of the proposal

The proposal involves a SSDA for a residential TOD development including in-fill affordable housing. The proposal will involve demolition of the existing site structures and construction of multiple residential flat buildings (RFBs) and associated works with site access to basement parking via McIntosh Street.

The proposal will provide up to 15% affordable rental housing for a minimum of 15 years and an additional 2% affordable housing in perpetuity. The development is proposed across three buildings of 9 storeys in height accommodating between 20,606 sqm and 25,272 sqm of residential floorspace (inclusive of affordable housing units) and basement car parking. This will accommodate approx. 165 apartments, including approx. 25 affordable apartments. The final height and GFA of the development is subject to further design refinement as part of the SSDA development process. Refer to the attached architectural documentation prepared by PMDL for further detail.

#### Compliance with minimum threshold in Planning System SEPP

The proposed development constitutes SSD pursuant to schedule 26A (in-fill affordable housing) of *State Environmental Planning Policy (Planning Systems)* 2021 (Planning Systems SEPP) being:

- A development on land in the Eastern Harbour City with an estimated cost of development greater than \$75 million. Please refer to the accompanying Estimated Development Cost report prepared by Mitchell Brandtman
- A development that does not involve development prohibited under an EPI applying to the land (noting that residential flat buildings are permitted with consent under Chapter 5 of the Housing SEPP).
- Up to 15% affordable housing (for 15 years).



#### Percentage of floor space to be provided as affordable housing

17% of the floor space is to be provided as affordable housing (up to 15% under Chapter 2 Housing SEPP and 2% under Chapter 5 of Housing SEPP). The scheme will accommodate approx. 165 apartments, including approx. 25 affordable apartments.

Any other land uses proposed

A residential land use is proposed. No other land uses are proposed.

#### Zoning and permissibility

The site is zoned R2 Low Density Residential under the Ku-ring-gai Local Environmental Plan 2015.

The site is located within a 'Tier 2' TOD area being 400 metres from the existing Gordon Railway Station (to the north-west), hence Chapter 5 TOD of the Housing SEPP is of relevance in terms of permissibility.

Under section 154 of the Housing SEPP, RFBs are permitted with development consent in a 'relevant residential zone'. A R2 zone is a 'relevant residential zone' in section 151 of the Housing SEPP, hence RFBs are permitted on the site.



Figure 3 Land use zoning map (Source: NSW Planning Portal Spatial Viewer)





Figure 4 Site location in TOD area (Source: NSW Planning Portal Spatial Viewer)

#### **Statutory context**

#### Other approvals

Section 4.41 of the Act identifies certain authorisations that are not required for SSD and section 4.42 of the Act identifies certain authorisations that cannot be refused if they are necessary for carrying out SSD, see Table 1 below.

Table 1: Summary of other approvals

NSW Legislation	Requirement for subject application	
Approvals that do not apply to SSD		
Fisheries Management Act 1994	No	
Heritage Act 1977	No	
National Parks and Wildlife Act 1974	No	
Rural Fires Act 1997	No	
Water Management Act 2000	No	
Legislation that must be applied consistently		
Fisheries Management Act 1994	No	
Mine Subsidence Compensation Act 1961	No	
Mining Act 1992	No	
Petroleum (Onshore) Act 1991	No	



NSW Legislation	Requirement for subject application
Protection of the Environment Operations Act 1997	No
Roads Act 1993	Unlikely, will be confirmed in the EIS preparation stage.
Pipelines Act 1967	No

Pre-conditions to exercising power to grant approval

Table 2 identifies the pre-conditions to be fulfilled by the consent authority prior to exercising their power to grant development consent.

Table 2: Pre-conditions to exercising power to grant approval

Instrument	Response	
<i>Biodiversity Conservation Act</i> 2016	Pursuant to section 7.9 of the <i>Biodiversity Conservation Act</i> 2016, SSDAs must be accompanied by a Biodiversity Development Application Assessment Report (BDAR) unless the Planning Agency Head, and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. This determination is referred to as a BDAR Waiver. A small portion of the site in 2 areas to the east and west of the site is mapped as having 'biodiversity values'. This generally correlates to the west to the local terrestrial biodiversity mapping, as shown below.	
	NSW Planning Portal Spatial Viewer  Minton's Street Gorden 2072	
	Materia Silver Gardon 2072       Image: Constraint Constrai	
	To satisfy the ISEAR, the Proponent will engage a suitably qualified ecologist to carry out a preliminary investigation and most likely a BDAR will follow for the EIS.	
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122 of the Transport and Infrastructure SEPP requires the consent authority to provide Transport for NSW with written notice of the development application for 'traffic- generating development' and take into considered any response. In accordance with schedule 3 of the Transport and Infrastructure SEPP, the development will not constitute traffic generating development as less than 300 dwellings will be delivered on a site with access to a road (generally).	



Instrument	Response
<i>State Environmental Planning Policy (Resilience and Hazards)</i> 2021	Section 4.6 of the Resilience and Hazards SEPP sets out that a consent authority must not consent to the carrying out of any development on land unless: - It has considered whether the land is contaminated;
	<ul> <li>If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be after remediation); and</li> </ul>
	<ul> <li>If the land requires remediation to make it suitable for the use, it is satisfied that the land will be remediated before the land is used for that purpose.</li> </ul>
	A preliminary site investigation and if required, detailed site investigation (DSI) will be prepared for the EIS. Should it be identified in the DSI that a remediation action plan is required, one will be prepared and accompany the EIS.

#### Mandatory matters for consideration

Table 3 sets out the matters that a consent authority will be required to consider in deciding whether to grant consent to the SSD. These matters will be addressed in detail in the EIS.

#### Table 3: Matters for consideration

Legislation	Matters for Consideration	Comment
The Act		-
Section 1.3	Objects of the Act	An assessment against the objects of the Act will be undertaken in the EIS.
Section 4.15	<ul> <li>a) the provisions of: <ol> <li>relevant environmental planning instruments</li> <li>any proposed instrument that is or has been subject of public consultation under the Act</li> <li>any development control plan</li> <li>any planning agreement</li> <li>the regulations</li> </ol> </li> <li>b) likely impacts of the development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality</li> <li>suitability of the site for the development</li> <li>any submissions made in accordance with the Act or Regulations</li> <li>the public interest.</li> </ul>	Section 4.15 of the Act will be addressed in detail in the EIS and supporting documentation for the SSD.



Legislation	Matters for Consideration	Comment	
Chapter 2 Affordable	15(c) Development to which division	15(c) Development to which division applies	
Housing. Part 2, Division 1 In-fill affordable housing	<ul> <li>(1) This division applies to development that includes residential development if—</li> <li>(a) the development is permitted with consent under Chapter 3, Part 4, Chapter 5 or another environmental planning instrument, and</li> </ul>	The site is zoned R2 Low Density Residential. Chapter 5 of the Housing SEPP permits RFBs in this relevant residential zone.	
	(b) the affordable housing component is at least 10%, and	The proposal seeks to provide 17% of the total GFA (inclusive of the bonus GFA) for affordable housing purposes. Up to 15% will be provided as affordable housing for a period of 15 years and 2% provided in perpetuity.	
	<ul> <li>(c) all or part of the development is carried out—</li> <li>(i) for development on land in the Six Cities Region, other than in the City of Shoalhaven local government area—in an accessible area, or</li> <li>(ii) for development on other land—within 800m walking distance of land in a relevant zone or an equivalent land use zone.</li> </ul>	The site is in an 'accessible area' being 400m of Gordon Railway Station.	
	(2) Affordable housing provided as part of development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing component under this division.	Any affordable housing required under another EPI will not be counted towards the affordable housing required by Chapter 2, Part 2, Division 1.	
	16 Affordable housing requirements	for additional floor space ratio	
	(1) The maximum floor space ratio for development that includes residential development to which this division applies is the maximum permissible floor space ratio for the land plus an additional floor space ratio of up to 30%, based on the minimum affordable housing component calculated in accordance with subsection (2).	The applicable maximum FSR under Chapter 5 (TOD) of the Housing SEPP is 2.5:1. A 30% increase equates to an FSR of 3.25:1. The proposed total FSR is expected to be compliant with the maximum permissible FSR	
	(2) The minimum affordable housing component, which must be at least 10%, is calculated as follows—	applicable to the site. The proposal seeks up to 30% FSR bonus, therefore up to 15% of the proposed floor space must be for affordable housing purposes (noting that	



Legislation	Matters for Consideration	Comment
	affordable housing component = additional floor space ratio + 2 (as a percentage)	an additional 2% is required to satisfy the provisions of Chapter 5 of the Housing SEPP considered further below).
	(3) If the development includes residential flat buildings or shop top housing, the maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the land plus an additional building height that is the same percentage as the additional floor space ratio permitted under	The applicable building height under Chapter 5 (TOD) of the Housing SEPP is 22 metres. A 30% bonus will increase the maximum height to 28.6 metres. The proposal is intended to sit below the 28.6 metre height plane, based on the preliminary
	subsection (1). Example— Development that is eligible for 20% additional floor space ratio because the development includes a 10% affordable bousing component, as	envelope. The Proponent and design team will be refining this upon receipt of the site survey and ongoing design work.
	affordable housing component, as calculated under subsection (2), is also eligible for 20% additional building height if the development involves residential flat buildings or shop top housing.	A clause 4.6 variation request will accompany the SSD in the event the proposal involves minor height contraventions.
	(4) This section does not apply to development on land for which there is no maximum permissible floor space ratio.	Not applicable – an FSR control applies.
	19 Non-discretionary development s	tandards – the Act, s4.15
	(1) The object of this section is to identify development standards for particular matters relating to residential development under this division that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.	Noted.
	Note— See the Act, section 4.15(3), which does not prevent development consent being granted if a non- discretionary development standard is not complied with.	
	(2) The following are non- discretionary development standards in relation to the residential development to which this division applies—	Subject site area is approximately 7,776 sqm.
	(a) a minimum site area of $450m^2$ ,	
	(b) a minimum landscaped area that is the lesser of— (i) 35m <sup>2</sup> per dwelling, or	Further details on the landscaping proposals will be provided at the EIS stage. The

Legislation	Matters for Consideration	Comment
	(ii) 30% of the site area,	scheme is expected to deliver at least the minimum landscape area required.
	(c) a deep soil zone on at least 15% of the site area, where—	Not applicable – refer to s19(3) below.
	<ul> <li>(i) each deep soil zone has minimum dimensions of 3m, and</li> <li>(ii) if practicable, at least 65% of the deep soil zone is located at the rear of the site,</li> </ul>	
	(d) living rooms and private open spaces in at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid-winter,	Not applicable – refer to s19(3) below.
	<ul> <li>(e) the following number of parking spaces for dwellings used for affordable housing—</li> <li>(i) for each dwelling containing 1 bedroom—at least 0.4 parking spaces,</li> <li>(ii) for each dwelling containing 2 bedrooms—at least 0.5 parking spaces,</li> <li>(iii) for each dwelling containing at least 3 bedrooms— at least 1 parking space,</li> </ul>	The proposal will achieve at least the minimum non- discretionary standards set out in the Housing SEPP. The final car parking provision will be agreed as part of the design development and is anticipated to comply with these requirements.
	<ul> <li>(f) the following number of parking spaces for dwellings not used for affordable housing—</li> <li>(i) for each dwelling containing 1 bedroom—at least 0.5 parking spaces,</li> <li>(ii) for each dwelling containing 2 bedrooms—at least 1 parking space,</li> <li>(iii) for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,</li> </ul>	The proposal will achieve at least the minimum non- discretionary standards set out in the Housing SEPP. The final car parking provision will be agreed as part of the design development and is anticipated to comply with these requirements.
	(g) the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,	Noted – an assessment will be undertaken as part of the EIS.
	(3) Subsection (2)(c) and (d) do not apply to development to which Chapter 4 applies.	Noted – Chapter 4 applies to this development. Accordingly, subsection (2)(c) and (d) do not apply.
	20 Design Requirements	
	(1) Development consent must not be granted to development for the purposes of dual occupancies,	Not applicable – refer to 20(2) which identifies that subsection (1) does not apply to



Legislation	Matters for Consideration	Comment	
	manor houses or multi dwelling housing (terraces) under this division unless the consent authority has considered the Low Rise Housing Diversity Design Guide, to the extent to which the guide is not inconsistent with this policy.	development to which Chapter 4 applies.	
	(2) Subsection (1) does not apply to development to which Chapter 4 applies.	Noted.	
	(3) Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with—	A detailed assessment will be undertaken as part of the EIS noting the site is located within a TOD precinct with a planned transition anticipated for this locality.	
	(a) the desirable elements of the character of the local area, or		
	(b) for precincts undergoing transition—the desired future character of the precinct.		
	21 Must be used for affordable hous	21 Must be used for affordable housing for at least 15 years	
	<ul> <li>(1) Development consent must not be granted to development under this division unless the consent authority is satisfied that for a period of at least 15 years commencing on the day an occupation certificate is issued for the development—</li> <li>(a) the development will include the affordable housing component required for the development under and the development under</li> </ul>	Noted – the Proponent commits to this outcome, and it's their expectation this will be conditioned by the Department at the consent stage.	
	section 16, 17 or 18, and (b) the affordable housing component will be managed by a registered community housing provider.	Noted.	
	(2) This section does not apply to development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation.	Not applicable.	
Chapter 4 Design of Residential Apartment Development	142 Aims of chapter – 149 Apartment Design Guide prevails over development control plans	Compliance with the ADG will be demonstrated in the EIS and supporting documentation.	
Chapter 5 Transport oriented development	151 Definitions Relevant residential zone Transport oriented development area	The R2 zoning of the land is a relevant residential zone. The site is located within a 'Tier 2' TOD area.	
	152 Land to which this chapter applies	The site is in the Ku-ring-gai LGA and is 400 metres from	

Legislation	Matters for Consideration	Comment
	(i) Ku-ring-gai	Gordon Railway Station (being less than 400 metres).
	153 Relationship to other environmental planning instruments	Noted.
	If there is an inconsistency between this chapter and another provision of this or another EPI, whether made before or after the commencement of this chapter, this chapter prevails to the extent of an inconsistency.	
	154 Development permitted with development consent in a TOD area	RFBs are permitted with development consent in the R2 zone under Chapter 5 of the Housing SEPP.
	<ul> <li>155 Maximum building height and maximum floor space ratio</li> <li>This section identifies development standards for development under this chapter that, if complied with, prevent the consent authority from requiring more onerous standards for matters.</li> <li>Maximum HOB for RFBs: 22 metres Maximum FSR for RFBs: 2.5:1</li> </ul>	Noted. As per earlier in this table, the up to 30% height and FSR bonus has been applied to these base TOD development standards.
	156 Affordable housing 2% of the GFA to be used for affordable housing and managed by a registered community housing provider in perpetuity.	2% of the GFA will be utilised for affordable housing in perpetuity to satisfy the TOD provisions.
	<ul> <li>157 Affordable housing parking spaces</li> <li>(a) for each dwelling containing 1 bedroom—0.4 parking space,</li> <li>(b) for each dwelling containing 2 bedrooms—0.5 parking space,</li> <li>(c) for each dwelling containing 3 or more bedrooms—1 parking space.</li> </ul>	These will be complied with at the EIS stage.
	<i>159 Minimum lot width</i> 21 metre wide at the front building line.	The site has a width of approximately 51 metres to the front of McIntosh Street, therefore complying with s159.
	160 Active street frontages	Not applicable.
	161 Consideration of the Apartment Design Guide	A detailed ADG compliance check will be prepared PMDL and be captured in the EIS.
Ku-ring-gai Local Environ	mental Plan 2015	
2.2 Zoning of the land to which this Plan applies	The zoned R2 Low Density Residential.	N/A
	RFBs are prohibited in the R2 zone in the KLEP. Notwithstanding, the	



Legislation	Matters for Consideration	Comment
	site benefits from the provisions under Chapter 5 of the Housing SEPP, which make RFBs permissible with consent.	
2.3. Zone objectives and Land Use Table	<ul> <li>To provide for the housing needs of the community within a low density residential environment.</li> <li>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</li> <li>To provide for housing that is compatible with the existing environmental and built character of Ku-ring-gai.</li> </ul>	Yes - the proposed development will deliver additional housing, including up to 17% affordable housing. This will contribute to meeting the housing needs of the community. The residential proposal does not impact the provision of facilities or services on other suitably zoned sites. The proposal will be compatible with the existing environmental and built character of Ku-ring- gai. This will be addressed in detail in the EIS.
<b>4.3 Height of Building</b> (2) The height of a building on any land is not to exceed the maximum height shown for the land on the <u>Height of Buildings</u> <u>Map</u> .	The applicable building height is 9.5 metres.	N/A - see discussion earlier in this letter.
<b>4.4 Floor Space Ratio</b> (2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the <u>Floor Space Ratio</u> <u>Map</u> .	The applicable FSR is 0.3:1.	N/A - see discussion earlier in this letter.
<ul> <li>5.10 Heritage Conservation</li> <li>(a) to conserve the environmental heritage of Ku-ring-gai,</li> <li>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</li> <li>(c) to conserve archaeological sites,</li> <li>(d) to conserve Aboriginal objects and</li> </ul>	<ul> <li>A portion of the site is located within a heritage conservation area (HCA #C15 – Gordon Park Estate, Mcintosh and Ansell Conservation Area) – see below. The site is also adjacent to a heritage conservation area (HCA #C17 Gordon Park Conservation Area) and in close proximity to the following heritage items:</li> <li>18 "Eryldene", dwelling house 17 Mcintosh Street (local and state significant)</li> <li>I28 Dwelling house 49 Werona Avenue</li> <li>I29 "Rochester", dwelling house 51 Werona Avenue</li> </ul>	Yes.



Legislation	Matters for Consideration	Comment
Aboriginal places of heritage significance.	Image: Signal state sta	
<b>6.1 Acid sulfate soils</b> (2) Development consent is required for the carrying out of works described in the table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works.	The site is classified as Class 5 on the Acid Sulfate Soils Map.	Yes.
<b>6.2 Earthworks</b> (1) The objective of this clause is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.	A Geotechnical Investigation will be prepared to consider the excavation and filling required on site to facilitate the proposed development.	Yes.
<ul> <li>6.3 Biodiversity protection</li> <li>(1) The objective of this clause is to protect, maintain and improve the diversity and condition of native vegetation and habitat.</li> </ul>	A suitably qualified ecologist to carry out a preliminary investigation and most likely a BDAR will follow for the EIS to address the Biodiversity Conservation SEPP and clause 6.3 of the LEP.	Yes.
<ul> <li>6.5 Stormwater and water sensitive urban design</li> <li>(1) The objective of this clause is to avoid or</li> </ul>	A suitably qualified civil engineer will be engaged to prepare a stormwater design to support the SSD proposal. Clause 6.5 will be addressed in detail in the engineer's report.	Yes.



Legislation	Matters for Consideration	Comment
minimise the adverse impacts of urban stormwater on the land on which development is to be carried out, adjoining properties, native bushland, waterways and groundwater systems.		
<ul> <li>6.6 Requirements for multi dwelling housing and residential flat buildings</li> <li>2) Despite any other provision of this Plan, development consent must not be granted for the erection of multi dwelling housing or a residential flat building on a lot in a residential zone unless the lot has an area of at least 1,200 square metres and minimum dimensions (width and depth) of at least— <ul> <li>(a) if the area of the land is less than 1,800 square metres or more—30 metres.</li> </ul> </li> </ul>	The site has a total area of 7,776 sqm. The site has a width and depth of at least 30 metres.	Yes, site has a width of approximately 51 metres and a depth of approximately 125 metres.

#### Community housing provider

In accordance with sections 21 and 156 of the Housing SEPP the affordable housing component for the development required under sections 16, 18 and 156 of the Housing SEPP, is required to be managed by a CHP for at least 15 years. The proponent has a working relationship with Echo Realty who are the CHP for a number of other SSDAs CDPM have worked with and they are expected to the CHP for this site. This will be confirmed as part of the SSDA lodgement.

### Accompanying documentation

PMDL has prepared a preliminary architectural package which accompanies this scoping meeting request. It provides preliminary site analysis and includes a concept building layout plan. The envelope design for the site is quickly evolving through design development and will be significantly progressed in time for the request for SEARs application.

## Housing Industry Specific SEARs

Housing Industry Specific SEARs are being requested for this project.



### Timing of SEARs and SSDA submission

We note that Ku-ring-gai Council are currently reviewing the TOD provisions applying to the site, and that this review may result in the site no longer benefitting from the TOD provisions. This review is anticipated to be concluded in the coming months, and the preparation and lodgement of an SSDA for the site is therefore time critical. Therefore, the proponent is anticipating lodging the SSDA for this site by the end of May 2025.

### Conclusion

We trust the information provided is sufficient for Industry Specific Housing SEARs to be issued for this project.

Should you wish to discuss the contents of this letter, please do not hesitate to contact the undersigned or Rebecca Sladen (Senior Associate) on <u>RebeccaS@gyde.com.au</u>.

Yours sincerely,

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Georgia Sedgman Director georgias@gyde.com.au