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SYDNEY NSW 2000**

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28 April 2025

Amy Watson
Director, Social and Affordable Assessments
Development Assessment & Infrastructure
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Amy,

SCOPING LETTER FOR STATE SIGNIFICANT DEVELOPMENT | 15A-15B MOSELEY STREET AND 25-31 DONALD STREET, CARLINGFORD

This Scoping Letter has been prepared on behalf of Capio Property Group (**the applicant**) regarding a future State Significant Development Application for infill affordable housing.

It provides a detailed description of the subject site and proposed project, and requests industry-specific Secretary's Environmental Assessment Requirements (**SEARs**) from the NSW Department of Planning, Housing and Industry (**DPHI**). Following receipt of this letter, it is also requested that an initial 'Scoping Meeting' is scheduled with the relevant Departmental staff within the next two weeks.

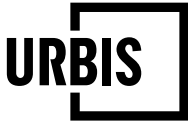
1. INTRODUCTION

The proposal seeks to establish a new in-fill affordable housing development in the form of residential flat buildings and a child-care centre at 15A-15B Moseley Street and 25-31 Donald Street, Carlingford. Further details of the site are set out within **Section 3** and details regarding the proposal are provided in **Section 5**.

The proposed development is State Significant Development (**SSD**) as it is new development for in-fill affordable housing on land in the Six Cities Region which has an estimated development cost of more than \$75 million for the residential component of the development. This is in accordance with Section 26A of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

The site is located within the "low and mid rise inner housing area" to which Chapter 6 of the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**) applies, as the site is within 400m walking distance of Carlingford Court Shopping Centre which is land identified as a "town centre". These provisions permit 'residential flat buildings' on the land zoned R4 High Density Residential with a maximum building height of 22m and a maximum floor space ratio (**FSR**) of 2.2:1.

The applicant is seeking to provide "in-fill affordable housing" in accordance with Chapter 2, Part 2, Division 1 of the Housing SEPP. These provisions enable up to 30% additional building height and up to 30% additional floor space. This is in addition to the low and mid-rise (**LMR**) controls established under Chapter 6 of the Housing SEPP.



In order to access these provisions, the applicant is required to provide at least 15% of the total gross floor area for affordable housing, to be managed by a registered Community Housing Provider (**CHP**) for at least 15 years. By utilising these provisions, the site is capable of delivering much-needed affordable housing in an accessible location.

The proposal will seek consent for the use of the child care centre as part of this SSD. However, the detailed fit-out and operation of the child care centre would be subject to a separate (local) DA.

The project qualifies for “Industry-Specific SEARs” because it is not designated development, is not partly or wholly prohibited, and does not involve a Concept SSDA.

This letter is also accompanied by the following technical documentation:

- **Attachment 1** – Survey Plan (prepared by Ramsay Surveyors)
- **Attachment 2** – QS Statement (prepared by Mitchell Brandtman)
- **Attachment 3** – Indicative Architectural Plans (prepared by Capio Property Group)

2. APPLICANT DETAILS

The applicant details for the proposed development are shown in Table 1.

Table 1 Applicant Details

Description	Details
Full Name(s)	Captag Investments Pty Ltd
Postal Address	Level 10, 189 Kent Street, Sydney NSW 2000
ABN	45 972 553 123
Nominated Contact	c/o (Toni Duncan – Urbis)
Contact Details	+61 2 8233 7629

3. SITE DESCRIPTION

The site is located at 15A and 15B Moseley Street, and 25-31 Donald Street, Carlingford and is located on the southern side of Moseley Street between Young Road and Tanderra Avenue near the Carlingford town centre. The legal description of the site is provided in **Table 2** below.

The site comprises a series of irregular lots with a total site area of 5,948 m². This is shown in Figure 1 below. The site has a frontage of approx. 79 metres to Moseley Street and a frontage of approx. 45 metres to Donald Street, and is located within the City of Parramatta local government area (**LGA**). The site slopes from north-east down towards the south-western portion of the site with a crossfall of approximately 12 metres.

All existing buildings, structures and trees on site have been demolished or removed, with the exception of a display suite for sales and marketing.

The site is burdened by an easement for water drainage which is 6 feet wide (identified on DP 536982). The easement is located through the centre of the site, and traverses three lots forming the subject site. This existing easement is proposed to be relocated as part of the proposed development.

Table 2 Legal Description of the Site

Property Address	Legal Description
15A Moseley Street, Carlingford	Lot 35 DP 536982
15B Moseley Street, Carlingford	Lot 34 DP 536982
25 Donald Street, Carlingford	Lot 5 DP 35555
27 Donald Street, Carlingford	Lot 33 DP 536982
29 Donald Street, Carlingford	Lot 32 DP 536982
31 Donald Street, Carlingford	Lot 2 DP 35555

Figure 1 Site Location Plan



Source: Nearmap 2025 (edited by Urbis)



3.1. SURROUNDING CONTEXT

The site is located within approximately 300 metres walking distance to the west of Carlingford Court Shopping Centre and 5.3 kilometres northeast of the Parramatta CBD. The site is well serviced by public transport with regular bus services at Carlingford Court Shopping Centre, and at Jenkins Road (approximately 350 metres west of the site). Stage 1 of the Parramatta Light Rail opened in December 2024 and provides public transport connections from Carlingford to Parramatta CBD via Camellia.

Development surrounding the site comprises a mix of land uses, varying between low and medium density to high density. The immediate area surrounding the site to the east, west and south is zoned R4 High Density Residential. Therefore, the surrounding area is undergoing significant change, particularly to the south of the site, with several residential apartment buildings under construction on nearby streets (including Paul Place, Tanderra Avenue, Post Office Street, and Thallon Street).

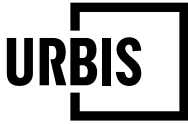
The area to the north of the site is zoned R2 Low Density Residential and includes The Harold West Reserve and St Paul’s Anglican Parish Centre which are surrounded by single residential dwellings.

4. PROJECT BACKGROUND

A summary of the development consent history relevant to the site is set out within the table below.

Table 3 History of Development Consent

DA Reference	Description	Status
DA/558/2023	<p>In December 2023, a development application (DA) was lodged for the demolition of existing buildings, and construction of two residential apartment buildings up to 4-6 storeys in height comprising 60 apartments, a child care centre and associated basement car parking and landscaping.</p> <p>The DA was subsequently withdrawn due to the acquisition of the adjacent site at 31 Donald Street and the desire to amend the proposed plans to incorporate this site.</p>	Withdrawn
DA/747/2023	<p>In December 2023, a DA was lodged for use of the existing dwelling as a display suite and sales office with associated parking, landscaping and signage. The DA was approved in June 2024.</p>	Approved
DA/759/2023	<p>In December 2023, a staged DA was lodged for the demolition of existing buildings, tree removal, and the construction of two residential apartment buildings up to 4-6 storeys in height comprising 70 apartments, a child care centre and associated basement car parking and landscaping.</p> <p>The DA was subsequently withdrawn so that the proposal could be redesigned to incorporate affordable housing.</p>	Withdrawn
DA/222/2024	<p>In April 2024, a staged DA was lodged for the demolition of existing buildings, tree removal, and the construction of two residential apartment buildings up to 4-6 storeys in height comprising 91 apartments (including 22 affordable housing units), a child care centre and associated basement car parking and landscaping.</p>	<p>Subject to NSWLEC Proceedings</p> <p>The outcome is anticipated to be imminent.</p>



DA Reference	Description	Status
	The DA is subject to a deemed refusal appeal in the NSW Land and Environment Court (NSWLEC) and is currently pending a decision.	
DA/219/2024	In October 2024, development consent was granted for early works including the demolition of all existing buildings and structures on site, as well as tree removal.	Approved

5. DEVELOPMENT DESCRIPTION

The key components of the proposed development are set out in the following table.

Table 4 Project Details

Descriptor	Project Details
Project Area	The site area is 5,948 m ²
Project Description	<p>The project comprises the demolition of the existing buildings on site and construction two residential flat buildings and a child care centre, including:</p> <ul style="list-style-type: none"> ▪ Demolition of all existing buildings and structures. ▪ Staged construction of two residential flat buildings and a child care centre, with a maximum building height of up to 28.6 metres, including: <ul style="list-style-type: none"> – Stage 1 – Buildings A1 and A2 including a total of 60 apartments. – Stage 2 – Building B including an 80-place child care centre and 76 apartments. ▪ A total of approx.. 136 residential apartments, including: <ul style="list-style-type: none"> – 106 market apartments – 30 affordable housing apartments to be managed by a CHP for 15 years (equivalent to at least 15% affordable housing based on the total proportion of all floor space) ▪ A total gross floor area (GFA) of approximately 14,044 sqm (equating to an FSR of approx. 2.36:1), including: <ul style="list-style-type: none"> – A child care centre comprising approx. 300 m² GFA – Total residential GFA of approx. 13,744 m² ▪ Excavation for approx. 2-3 shared basement levels including: <ul style="list-style-type: none"> – 139 residential parking spaces – 21 visitor spaces (including one car wash space), and 14 accessible car parking spaces – Motorcycle and bicycle parking spaces

Descriptor	Project Details
	<ul style="list-style-type: none"> ▪ Vehicular access from Donald Street for the residential apartments, and access from Moseley Street for the child care centre (including 26 parking spaces for the child care centre). ▪ Associated civil works (including earthworks and stormwater management works), landscaping, and the extension and augmentation of physical infrastructure and utilities as required.
Expected Estimated Development Cost (EDC)	In excess of \$75,000,000 (excluding GST) for the residential component. Refer to the QS Statement included at Attachment 2 for further details.

6. SUMMARY OF PLANNING CONSIDERATIONS

6.1. STRATEGIC PLANNING CONTEXT

The New South Wales (NSW) Government recognises the need to build more homes for the State’s growing population, particularly to boost housing supply and improving housing affordability.

Under the National Housing Accord, NSW is tasked with delivering approximately 377,000 new well-located dwellings (including approximately 15,800 social and affordable dwellings) by 2029. The Accord brings together all levels of government, investors, and the construction sector to unlock additional affordable housing supply over the medium term

DPHI has released several key policy initiatives to incentivise and support the delivery of additional homes (including affordable housing) under the Housing SEPP. Of relevance to the proposed development, these include:

- ‘In-fill affordable housing’ reforms gazetted on 14 December 2023.
- ‘Low and mid-rise housing’ (LMR) reforms gazetted on 28 February 2025.

The proposed development is eligible for the uplift under both the LMR reforms and the “in-fill affordable housing reforms” and represents a positive response to the current housing crisis in NSW.

6.2. EXISTING LOCAL PLANNING FRAMEWORK

The *Parramatta Local Environmental Plan 2023 (Parramatta LEP 2023)* is the principal local environmental planning instrument relevant to the site. A summary of key development standards is provided as follows:

- **Zoning and Permissibility** – The site is zoned R4 High Density Residential. *Residential flat buildings* and a *centre-based child care facility* is permitted with consent in the R4 High Density Zone under the Parramatta LEP 2024.
- **Building Height** – refer to **Section 6.2.1** for further details.
- **Floor Space Ratio** – refer to **Section 6.2.2** for further details.

- **Heritage** – The site is not identified as a heritage item of local or State significance, and is not located with a Heritage Conservation Area. There are no heritage items or conservation areas within the immediate vicinity of the site.
- **Biodiversity** – The site is not identified as being affected by any mapped areas of biodiversity or ecological value / significance.
- **Acid Sulfate Soils** – The site is not identified as land affected by acid sulfate soils.
- **Flooding** – The site is not mapped as being affected by the Probable Maximum Flood (PMF) or the 1% AEP flood level.
- **Design Excellence** – The site is not identified within a ‘design excellence precinct’ and is not subject to the provisions under Clause 6.13 of the Parramatta LEP 2023.

6.2.1. Building Height

Clause 4.3 of the Parramatta LEP established a mapped maximum building height of 16m for the majority of the site, with the exception of the southern most lot at 25 Donald Street which is subject to a maximum building height of 21 metres (refer to **Figure 2** below).

Figure 2 Height of Buildings Map (Extract from Parramatta LEP 2023)



The proposed development is also subject to recently gazetted development standards under the Low and Mid-Rise Housing Policy (**LMR**). These controls are set out within Chapter 6 of the Housing SEPP. The proposed development seeks to incorporate up to an additional 30% height in accordance with the infill affordable housing incentives (subject to providing at least 15% affordable housing).

The proposed development is capable of complying with the maximum permissible building height of 28.6 metres (calculated based on the Low and Mid-Rise height control, plus up to an additional 30%).

Building	LEP Height	LMR Height	Max. Permissible Height (LMR + 30%)
Buildings A1 and B	16m	22m (6 storeys)	Up to max. 28.6 metres
Building A2	21m	22m (6 storeys)	Up to max. 28.6 metres

Refer to **Section 6.3** and **Section 6.4** of this letter for further details.

6.2.2. Floor Space Ratio

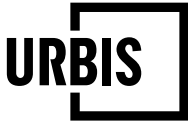
Clause 4.4 of the Parramatta LEP establishes a mapped maximum FSR of 1:1, with the exception of southern-most lot at 25 Donald Street which is subject to a maximum FSR of 1.49:1 (refer to **Figure 3** below).

Figure 3 Floor Space Ratio Map (Extract from Parramatta LEP 2023)



The proposed development also seeks to incorporate up to an additional 30% FSR in accordance with the infill affordable housing incentives (subject to providing at least 15% affordable housing).

Based on preliminary massing studies, the proposed development would accommodate approximately 14,044 sqm of GFA. This equates to a maximum FSR of approximately 2.36:1 which complies with the maximum permissible floor space ratio of 2.86:1 (calculated based on the Low and Mid-Rise floor space ratio control, plus up to an additional 30%).



Building	LEP FSR	LMR FSR	Max. Permissible FSR (LMR + 30%)
Buildings A1 and B	1:1	2.2:1	2.86:1
Building A2	1.49:1	2.2:1	2.86:1

Refer to **Section 6.3** and **Section 6.4** of this letter for further details.

6.3. LOW AND MID RISE HOUSING PROVISIONS

The site is located within 400m walking distance of Carlingford Court Shopping Centre which is mapped as a town centre under Chapter 6 (Low and mid rise housing) of the Housing SEPP. The site is therefore located within a “low and mid rise housing inner area”.

The LMR provisions of the Housing SEPP apply to the proposal as the development:

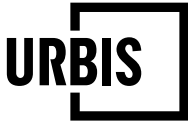
- Is not located on bush fire prone land, or land identified as a coastal vulnerability area or a coastal wetlands or littoral rainforests area.
- Is not located within a transit oriented development (**TOD**) precinct, an “Accelerated TOD Precinct” or a “deferred TOD area” (and is therefore not subject to the provisions under Chapter 5 of the Housing SEPP).
- Is not on land that is a heritage item, or on which a heritage item is located.
- Meets the locational requirements of the Housing SEPP.
- Is not in a flood planning area within any of the identified LGAs.
- Is not on land affected by ANEF noise contours.
- Is not located on land within 200 metres of a relevant pipeline.
- Is not located within 800 metres of a public entrance to a railway, metro or light rail station as listed in Schedule 12 of the Housing SEPP.

The site is also located on land zoned R4 High Density Residential under the Parramatta LEP 2023 and proposes to the construction of two residential flat buildings. The proposed development is therefore eligible to utilise the uplift in development standards under the LMR provisions (as set out within Sections 175 and 180 of the Housing SEPP).

In accordance with Section 179 of the Housing SEPP, consideration will be given to the *Tree Canopy Guide for Low and Mid Rise Housing* (published by the Department in February 2025) as part of any future SSD application.

6.4. PERMISSIBILITY AND STATE SIGNIFICANT DEVELOPMENT CLASSIFICATION

The site is zoned R4 High Density Residential Development under the Parramatta LEP 2023. Residential accommodation (including residential flat buildings) and centre-based child care facilities are permitted with consent in the R4 zone.



The proposal is classified as SSD in accordance with Schedule 1, Section 26A of the Planning Systems SEPP as it is development to which Chapter 2, Part 2, Division 1 (In-fill affordable housing) of the Housing SEPP applies.

Specifically, the in-fill affordable housing provisions of the Housing SEPP apply to the proposal as the development:

- Comprises new residential development which is permitted with consent under the Parramatta LEP 2023, and to which Chapter 6 (Low and mid rise housing) of the Housing SEPP applies.
- Has an estimated development cost that exceeds \$75 million for the part of the development that is residential development.
- Meets the locational requirements of the Housing SEPP (it is located on land within the Six Cities Region).
- Will provide at least 15% of the total floor space as affordable housing for at least 15 years.

In accordance with Section 4.5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, the Minister for Planning and Public Spaces would be the consent authority for the proposed development.

Should the additional building height sought under the in-fill affordable housing provisions result in the proposed development exceeding the equivalent proportion of additional floor space ratio (in accordance with Section 16(3) of the Housing SEPP), the intention would be to submit a Clause 4.6 Variation Request to seek a variation to the maximum permissible building height as part of any SSD. The proposed development is still indicative and subject to change. Therefore, the extent of variation will be confirmed as part of the SSD.

6.5. REQUEST FOR INDUSTRY-SPECIFIC SEARS

As set out within this Scoping Letter, the proposed residential development is permissible with consent and is classified as SSD. The proposal is also eligible for industry-specific SEARS for the following reasons:

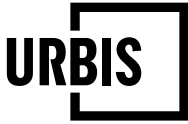
- The proposal does not meet the thresholds for 'designated development' under Schedule 3 of the *Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)*,
- The proposal is wholly permissible with consent under the relevant environmental planning instruments, and
- The proposal is not a concept development application.

Therefore, this Scoping Letter requests the issue of industry-specific SEARS for in-fill affordable housing to allow the subsequent preparation of a future SSD application.

6.6. APPLICATION OF THE HOUSING SEPP

6.6.1. Overview

As set out above, the site is located within 400m walking distance of land mapped as a town centre to which Chapter 6 of the Housing SEPP applies. In addition, the applicant is seeking to utilise the 'in-fill affordable housing' provisions under Chapter 2, Part 2, Division 1 of the Housing SEPP.



The proposed development is consistent with the relevant provisions of the Housing SEPP (Chapters 2, 4 and 6) as summarised in the following table.

Table 5 Key Provisions of the Housing SEPP

Provision	Comment
Chapter 2 Affordable Housing	
Section 15A (Objective of Division)	The proposed development will facilitate the delivery of new infill affordable housing to meet the needs of very low, low and moderate income households, and is therefore consistent with the objective of Chapter 2, Division 1 of the Housing SEPP.
Section 15B (Definitions)	The proposed <i>residential flat building</i> is 'residential development' for the purpose of applying this policy.
Section 15C (Development to which Division Applies)	<p>The proposed development is permitted with consent in the R4 zone under the Parramatta LEP 2023.</p> <p>The proposed development would also incorporate an affordable housing component of at least 15%, and will be carried out on land within the Six Cities Region.</p> <p>The site is not identified as an Accelerated TOD Precinct, nor is it identified as the Warrawong Site. Therefore, the relevant provisions apply to the proposed development.</p>
Sections 16-18 (Affordable Housing requirements)	The proposed development would be seeking to provide at least 15% affordable housing to be managed by a Community Housing Provider (CHP) for a 15-year period to enable up to an additional 30% in height and floor space to be achieved above the 'base' controls established under Chapter 6 of the Housing SEPP. This additional height and floor space would be utilised for the delivery of additional housing on the site.
Section 19 (Non-Discretionary Standards)	The applicant would ensure that consideration is given to achieving compliance with the key development standards as part of the preparation of the proposed infill affordable housing SSD.
Section 20 (Design Requirements)	As part of the SSD application, and through engagement with the GANSW appointed SDRP, the applicant will ensure that the design of the proposed development is compatible with the desired future character of the area (noting that the surrounding area is undergoing transition towards medium and high density development).
Section 21 (Must be Used for Affordable Housing for 15 Years)	The applicant would commit to the provision of the affordable housing component being managed by a registered CHP for a period of at least 15 years from the day an occupation certificate is issued for the development.
Chapter 4 Design of Residential Apartment Development	
Section 144 (Application of Chapter)	The proposed development is for a residential apartment development which comprises the erection of new buildings on site that is at least 3-storeys in height and contains at least 4 dwellings. Therefore, this chapter of the Housing SEPP applies.

Provision	Comment
Section 145 (Referral to Design Review Panel for Development Applications)	The proposed development is for a residential apartment development that is classified SSD. Therefore, this section does not apply.
Section 146 (Referral to Design Review Panel for Modification Applications)	The proposed development does not comprise a modification application for residential apartment development. Therefore, this section does not apply.
Section 147 (Determination of Development Applications and Modification Applications for Residential Apartment Development)	The quality of the design of the development and the ADG will be considered by the consent authority as part of the SSD application. In accordance with this section of the Housing SEPP, it is noted that compliance with design criteria specified in the ADG is not required by the consent authority as part of the SSD application.
Section 148 (Non-Discretionary Development Standards for Residential Apartment Development – the Act, s 4.15)	The proposed development is capable of complying with the non-discretionary development standards in relation to minimum car parking provision, minimum internal apartment areas, and minimum ceiling heights.
Section 149 (Apartment Design Guide prevails over DCPs)	<p>The proposed development is capable of complying with the key ADG design criteria in relation to visual privacy, solar access, common circulation and spaces, apartment size and layout, ceiling heights, private open space and balconies, natural ventilation and storage.</p> <p>Based on the preliminary Architectural Plans included at Attachment 3, the proposed development achieves the following:</p> <ul style="list-style-type: none"> ▪ Solar Access – 70.5% of apartments (96 apartments) receive the required solar access at mid-winter. 11% of apartments (15 apartments) would receive no direct sunlight at mid-winter. This complies with the ADG. ▪ Cross Ventilation – 69.8% of apartments (95 apartments) are naturally cross ventilated. This complies with the ADG. ▪ Deep Soil Planting – Approximately 22.2% of the site area (1,325 sqm) could be used for deep soil planting. The exact amount of deep soil planting is subject to further detailed design by a landscape architect. However, large areas of green space (free of basement structure) are proposed to be provided which demonstrates that the site is able to comply with the minimum 15% required by the Housing SEPP (and well exceeds the minimum ADG control). ▪ Communal Open Space – Approximately 25.4% (1,513 sqm) of the site area could be used as communal open space. Similar to the above, the exact area will be subject to further detailed design by a landscape architect. However, the site is capable of complying with the minimum 25% ADG control. ▪ Building Separation – Building separation is generally compliant with the ADG and visual privacy setback criteria.
Chapter 6 Low and Mid Rise Housing	
Section 163 (Definitions)	The site is located within 400m walking distance of Carlingford Court shopping centre (mapped as an identified “town centre” under the Housing

Provision	Comment
	SEPP. Therefore, the site is located within a <i>low and mid rise housing inner area</i> and the provisions of Chapter 6 therefore apply.
Section 164 (Land to Which Chapter Applies)	The site and proposed development is not subject to any of the environmentally sensitive lands set out within this section.
Section 175 (Development Standards – Low and Mid Rise Housing Inner Area)	The proposed development is located within a low and mid rise housing inner area on R4 High Density Residential land. The proposed development is therefore subject to a maximum height of 22m (for residential flat buildings).
Section 177 (Landscaping – Residential Flat Buildings or Shop Top Housing)	The proposed development will give consideration to the <i>Tree Canopy Guide for Low and Mid Rise Housing (February 2025)</i> as part of the future SSD.
Section 180 (Non-Discretionary Development Standards – Residential Flat Buildings and Shop Top Housing in Zone R3 or R4)	The proposed development is subject to a base FSR of 2.2:1 and a base building height of 22m in accordance with this section.

6.6.2. Application of the Height and FSR Bonuses (Housing SEPP)

The proposed development is seeking to utilise the 30% uplift for both for space and height available under Chapter 2 of the Housing SEPP, on top of the ‘base’ height and floor space established under Chapter 5 (Low and Mid Rise Housing) of the Housing SEPP.

This equates to the following maximum built form controls:

- **Building Height** – ‘Base’ LMR height of 22m + 30% = **28.6m**.
- **Floor Space Ratio** – ‘Base’ LMR floor space of 2.2:1 + 30% = **2.86:1**

The proposed development is capable of complying with both the maximum permissible height and floor space ratio controls.

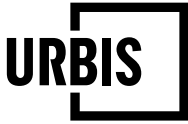
6.6.3. Breakdown of Affordable Housing GFA

As noted above, the proposed development is seeking to utilise the height and floor space bonuses available under Chapter 2 of the Housing SEPP. To access these controls, the applicant is required to deliver:

- At least 15% of the total gross floor area as affordable housing (to be managed by a registered CHP for at least 15 years from the day an occupation certificate is issued for the development).

A high-level compliance breakdown of the proposed affordable housing is provided below:

- **Total proposed GFA** – 14,044 m²
- **Minimum required affordable housing requirement** (15%) – 2,106 m²
- **Proposed affordable housing provision** (15%) – At least 2,106 m²



The proposed development is capable of complying with the provision of affordable housing (calculated based on the proportion of total GFA).

A registered CHP is yet to be identified to manage the affordable housing portion of the development. However, discussions have commenced with several interested CHPs. A registered CHP will be identified and confirmed as part of the SSD application.

6.6.4. Provision of Car Parking

Chapter 2, Division 1 of the Housing SEPP establishes “non-discretionary” development standards for in-fill affordable housing developments. This includes standards related to the provision of car parking.

The applicable car parking rates for in-fill affordable housing developments are as follows:

Market Housing

- 1 bed (or studio) – at least 0.5 spaces per apartment.
- 2 bed – at least 1 parking space per apartment.
- 3+ bed – at least 1.5 parking spaces per apartment.

Affordable Housing

- 1 bed (or studio) – at least 0.4 spaces per apartment.
- 2 bed – at least 0.5 parking space per apartment.
- 3+ bed – at least 1 parking space per apartment.

The proposed development will ensure that the car parking is provided for the residential development in accordance with these minimum requirements. The proposed development will also ensure that car parking for the child care centre will be in accordance with the maximum parking rates set out within the Parramatta LEP 2023. The proposed development is capable of complying with the applicable parking rates under the Housing SEPP and the Parramatta LEP 2023.

Notwithstanding the above, it is noted that the DPHI ‘In-fill Affordable Housing’ Practice Note (December 2023) sets out the following clarification:

Non-discretionary development standards do not prevent the consent authority from granting consent even though a non-discretionary development standard is not complied with. Particularly, where the Housing SEPP or another EPI contains more permissive standards for the same matter.

For example, the in-fill affordable housing provisions include a non-discretionary development standard for minimum parking rates. The consent authority cannot refuse a DA based on parking rate if these minimum rates are met. If another planning instrument contains a more permissive standard, or the consent authority is of the opinion that a lower parking rate is justified on merit, it is not intended that a written variation request pursuant to clause 4.6 should be required for the nondiscretionary parking standard under the Housing SEPP.

6.7. OTHER RELEVANT LEGISLATION

The following legislation is relevant to the project and will be considered as part of the future SSD application:

- *Biodiversity Conservation Act 2016.*

- *State Environmental Planning Policy (Planning Systems) 2021.*
- *State Environmental Planning Policy (Sustainable Buildings) 2021.*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021.*
- *State Environmental Planning Policy (Resilience and Hazards) 2021.*
- *Parramatta Local Environmental Plan 2023.*

6.8. PRELIMINARY ASSESSMENT OF KEY PLANNING CONSIDERATIONS

The applicant has assembled a project team to review any potential environmental impacts arising from the proposed in-fill affordable housing SSD. This includes a preliminary assessment of potential environmental impacts which may arise from the increases in height and floor space beyond what is currently allowed for under the LEP planning controls.

The key matters explored in this preliminary phase include the following:

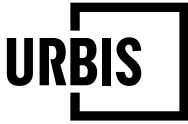
- **Land Use and Response to Local Character** – The site is located within 400 metres walking distance of Carlingford Court Shopping Centre (mapped as a ‘town centre’). The Housing SEPP allows residential flat buildings with uplift in height and floor space standards beyond the base controls set out within the Parramatta LEP 2023. This represents a clear change for the local area (which comprises predominantly low to medium density housing at present).

The response to the current character of the area (and importantly, the desired future character of the area), will be an important consideration for the proposed development.

- **Design Review** – The site is not identified within a ‘design excellence precinct’ and is not subject to the design excellence provisions under Clause 6.13 of the Parramatta LEP 2023. Notwithstanding this, it is understood that a State Design Review Panel (**SDRP**) process may be required to facilitate a review of the design quality of the proposed development.

The applicant is keen to explore an SDRP process following formal lodgement of the SSD. This would ensure the application can be lodged in an expedited manner (in accordance with GANSW’s “Wait Time Reduction Scheme”).

- **Overshadowing/Solar Access** – Careful consideration will be given to solar access and additional overshadowing of properties in the vicinity of the site, particularly to the south of the site (beyond what has already been assessed as part of DA/222/2024). This consideration would also take into account existing development, the development potential of neighbouring sites, as well as any DAs proposing uplift that are either under assessment or approved within the area immediately surrounding the site.
- Preliminary shadow diagrams have been prepared as part of the Architectural Plans (included at **Attachment 3**). These diagrams show the indicative building separation to neighbouring buildings, as well as the additional shadows cast on the surrounding area (comparing the base LMR building height to the maximum permissible building height including the infill-affordable bonus).
- **Residential Amenity** – The site benefits from its substantial size, corner allotment and access to both Donald Street to the south and Moseley Street to the north. The design approach for the proposed development aims to ensure that all residential apartments are sufficiently setback from adjoining properties to ensure a high level of amenity in relation to solar access, natural ventilation and privacy / outlook.



Detailed consideration will be given to the proposed development's consistency with the relevant Housing SEPP and Apartment Design Guide (**ADG**) provisions as part of the subsequent SSD application.

- **Vehicular Access and Parking** – The proposed development will accommodate a consolidated basement car parking for residents with access via Donald Street. Car parking spaces will be also provided for the child-care centre within the site's boundary with access via Moseley Street to the north. A traffic consultant has been engaged to optimise vehicular access to and from the site for both the residential and child care centre uses.

6.9. INDICATIVE TIMEFRAME

Once SEARs are issued, it is anticipated that the SSDA would be formally lodged within the next 6 months (noting that this timeframe is indicative and subject to finalisation of various technical inputs).

7. CONCLUSION

In summary, the site is strategically located and well placed to accommodate additional housing in accordance with the objectives of in-fill affordable housing. In addition, the provision of 15% affordable housing provides a positive response to the current housing crisis in NSW.

We trust that the information provided with this letter provides sufficient details to provide the Department with a comprehensive understanding of the proposed development, and to facilitate the issue of industry-specific SEARs.

If you have any questions, please do not hesitate to contact either myself or Andrew Harvey (Director) on (02) 8233 7606 or at aharvey@urbis.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Toni Duncan".

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CC: Jasmine Tranquille (Senior Planning Officer, Social and Affordable Assessments – DPHI)
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