

19 November 2020

218757

Jim Betts
Secretary, Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr. Betts,

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS SCOPING REPORT – 26-42 EDEN STREET & 161-179 PRINCES HIGHWAY, ARNCLIFFE

This report has been prepared by Ethos Urban on behalf of Billbergia regarding 26-42 Eden Street and 161-179 Princes Highway, Arncliffe (the site). The intent is to redevelop the site as a mixed-use precinct with community, retail, and residential uses, involving both market and social housing, on behalf of the NSW Land and Housing Corporation (LAHC)'s as part of their 'Communities Plus' initiative.

The capital investment value is >\$30 million, therefore the proposed development is State Significant Development (SSD) in accordance with Clause 10 under Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

The development comprises a State Significant Development Application (SSDA) for the demolition of existing buildings, and construction and operation of a new mixed-use precinct comprising retail, residential and community uses across four tower buildings, in addition to associated landscaping, public open space, vehicular parking, and servicing uses.

The purpose of this letter is to request the Secretary's Environmental Assessment Requirements (SEARs) to enable the preparation of an Environmental Impact Statement (EIS) for the proposal. To support the request for SEARs, this letter provides an overview of the proposal, sets out the statutory context, and identifies the key environmental and planning issues likely to be associated with the proposal. It should be read with reference to the following:

- Preliminary Design Summary Report prepared by Group GSA (**Attachment A**);
- Site Survey prepared by Cardno (**Attachment B**); and
- Preliminary Traffic Statement prepared by Stanbury Traffic Planning (**Attachment C**).

A BDAR Waiver has been prepared by Cumberland Ecology and has been submitted under a separate cover.

1.0 The site

1.1 Background

The Eden Street site is currently owned by the Land and Housing Corporation (LAHC) and comprises 142 social housing units. *State Environmental Planning Policy (State and Regional Development) Amendment (Eden Street) 2018* was adopted on 12 October 2018, amending the SRD SEPP to include the site as a LAHC State significant development site. The Bayside West Precincts (Arncliffe, Banksia and Cooks Cove), including the site, had their local planning controls amended as part of *State Environmental Planning Policy Amendment (Arncliffe and Banksia Precincts) 2018* to reflect the NSW Government's *Bayside West Precincts 2036* plan to revitalise the area. The site retained its B4 Mixed Use zoning, the height limit increased from 28 to 70 metres, and the floor space ratio (FSR) increased from 2.5:1 to 4:1.

The planned redevelopment of the site is part of the NSW Government 'Communities Plus' program, which seeks to deliver new communities with good access to transport, employment, improved facilities, and open space.

Development delivered under Communities Plus is mixed-tenure – that is, a mix of both social and market housing. This mix serves two purposes: to offset the cost of delivering the new social housing, and to integrate communities.

Billbergia is partnering with LAHC to deliver the project including 180 new social housing dwellings. The social housing will be managed by Evolve Housing, a Community Housing Provider (CHP).

1.2 Site context

The site is in Arncliffe, within the Bayside Local Government Area (LGA) as shown in **Figure 1** below. The surrounding land uses are predominantly residential. Arncliffe railway station is located approximately 100 metres to the northwest of the site. Immediately to the northeast of the site are two 4-storey apartment buildings known as 20-24 Eden Street, apartment buildings and detached dwellings are further north. The site is bounded by residential apartment buildings generally ranging from 2-4 storeys in height across its long Eden Street frontage to the northwest.

To the south of the site, between the site and the Forest Road are a number of detached dwellings, attached dwellings, as well as shop top housing and retail uses at the corner of Forest Road and Eden Street. To the east of the site, across the Princes Highway, are remnant industrial uses in addition to the recently constructed 10 storey mixed-use 'Endeavour Apartments' at 118 Princes Highway.

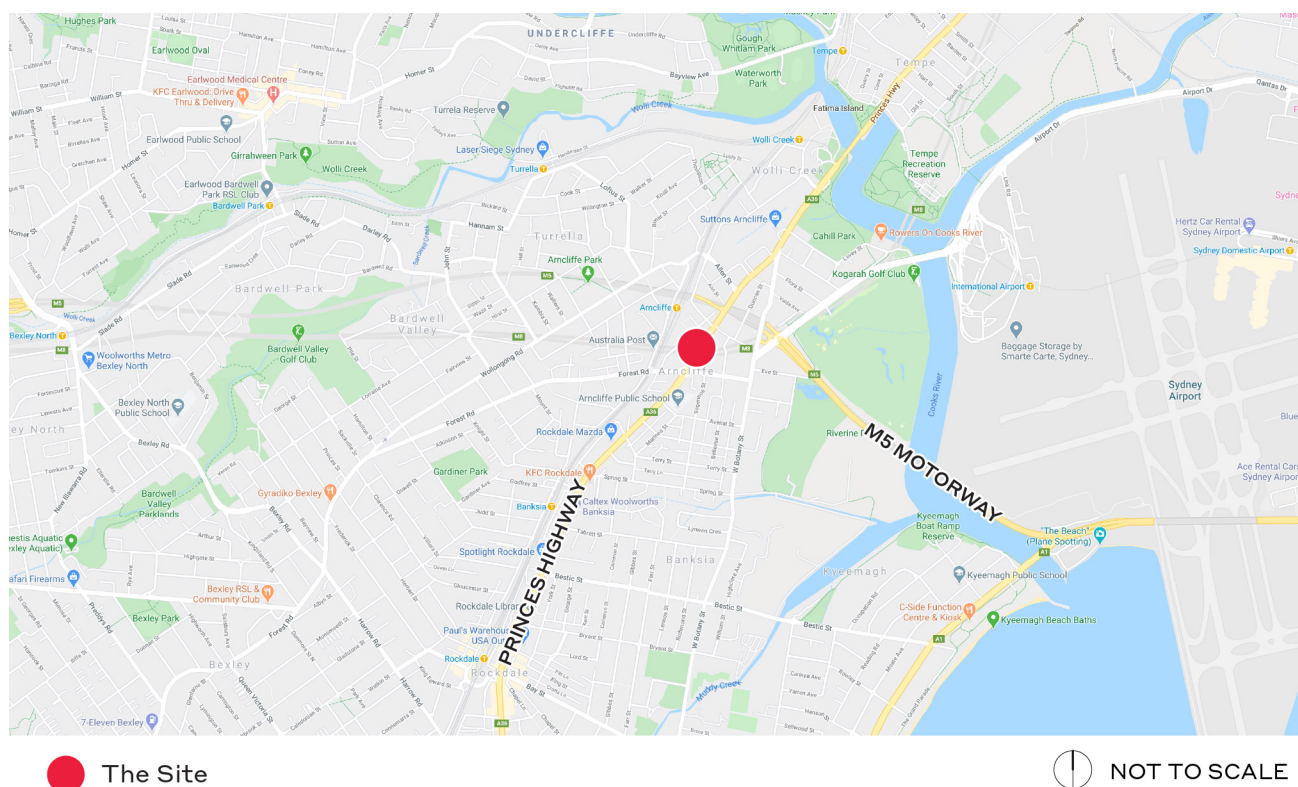


Figure 1 Site context

Source: Google Maps, edits by Ethos Urban

1.3 Site description

The site is known as 26-42 Eden Street and 161-179 Princes Highway, Arncliffe. It is approximately 13,440m² in size, and is irregularly shaped. It comprises the Eden Street State Significant Development Site, as shown in **Figure 2** below. The site is located across 13 different allotments (refer to **Table 1** and **Figure 3**). There are currently 142 social housing dwellings within a series of 3 storey apartment buildings, above ground car parking and open space.

Vehicular access is via Eden Street. A Site Survey has been prepared by Cardno and is attached to this letter at **Attachment B**.

Table 1 Site description

Lot no. (Figure 3)	Title	Approx. area (m ²)
1	Lot 1 / DP447649	6,207m ²
2	Lot 12 / DP23701	616m ²
3	Lot 11 / DP23701	622m ²
4	Lot 10 / DP23701	639m ²
5	Lot 9 / DP23701	658m ²
6	Lot 8 / DP23701	651m ²
7	Lot 7 / DP23701	611m ²
8	Lot 1 / DP23701	641m ²
9	Lot 2 / DP23701	632m ²
10	Lot 3 / DP23701	861m ²
11	Lot 26 / DP1228031	837m ²
12	Lot 25 / DP1228031	425m ²
13	Lot 3 / DP1094906	125m ²



Figure 2 Eden Street State Significant Development Sites Map

Source: DPIE



Figure 3 Site aerial

Source: Nearmap, Ethos Urban

2.0 Description of the proposed development

The SSDA will propose the demolition of all existing buildings on site and the construction of a 4-tower mixed-use precinct with residential, retail and community space uses. The development will create a vibrant neighbourhood with buildings designed to maximise residential amenity outcomes, and a diverse open space network designed to create a community oriented, active and inclusive public domain. In line with the 'Communities Plus' initiative, the proposal aims to deliver an integrated community of private market and social housing dwellings and strengthen the site's connection to Arncliffe railway station, the Princes Highway and enhance the liveability of the broader precinct. Preliminary indicative photomontages of the proposal are shown in **Figure 4** below.

Specifically, the development will seek consent for:

- Approximately 714 residential apartments (60,264m²) within four buildings between 17-21 storeys in height, including:
 - Approximately 534 market housing residential apartments in Buildings A, B and D, comprising:
 - 171 x 1 bedroom apartments;
 - 207 x 2 bedroom apartments;
 - 156 x 3 bedroom apartments;
 - Approximately 180 social housing residential apartments in Building C, comprising:
 - 101 x 1 bedroom apartments;
 - 63 x 2 bedroom apartments;
 - 8 x 3 bedroom apartments;
 - Approximately 3,360m² of communal open space.
- An estimated 4,235m² of retail/commercial floor space.
- Potential for a 1,830m² community centre.
- A childcare centre accommodating 90 children and 28 staff.
- A 4,000m² public park, an 870m² public meeting space and through site link.
- 950 parking spaces across 3 levels of basement plus lower ground level.

Architectural drawings are provided in the Design Summary Report prepared by Group GSA at **Attachment A**.

3.0 Strategic framework and context

3.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for SSD. Under Section 4.5, the Minister of Planning is the relevant consent authority for SSD. Section 4.12(8) requires that Development Applications for SSD must be accompanied by an Environmental Impact Statement (EIS) that meets the requirements as set out in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

3.2 State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development which is declared to be State Significant. Clause 8(b) of the SEPP identifies that development is SSD for the purposes of the EP&A Act if it is specified in Schedule 1 or 2 of the SEPP. Clause 10 'Development at NSW Land and Housing Corporation Sites' of Schedule 2 of the SEPP specifies that:

(1) *Development on land identified as a NSW Land and Housing Corporation Site on the State Significant Development Sites Map [is SSD] if the development—*

- (a) *is carried out by or on behalf of the NSW Land and Housing Corporation, and*
- (b) *has a capital investment value of more than \$30 million.*

The proposal is SSD as it is located on the identified Eden Street site, is being carried out on behalf of the NSW Land and Housing Corporation as part of the 'Communities Plus' programme, and has a capital investment value of more than \$30 million.

Furthermore, it should be noted that clause 8(2) of SRD SEPP states that if a single development application comprises development that is only partly under SSD, the remainder of the development may also be declared SSD for the purpose of the EP&A Act.

3.3 State Environmental Planning Policy (Affordable Rental Housing) 2009

Division 1 of Part 2 of *State Environmental Planning Policy (Affordable Rental Housing) 2009* (SEPP ARH) applies to development for the purpose of dual occupancies, multi-dwelling housing or residential flat buildings if the development is permissible with consent, the site does not contain a heritage item, and all or part of the development is located within a prescribed distance to public transport. Under Clause 13 of SEPP ARH, development to which the SEPP applies is eligible for a floor space ratio bonus derived from the existing FSR and amount of affordable housing to be provided across the site.

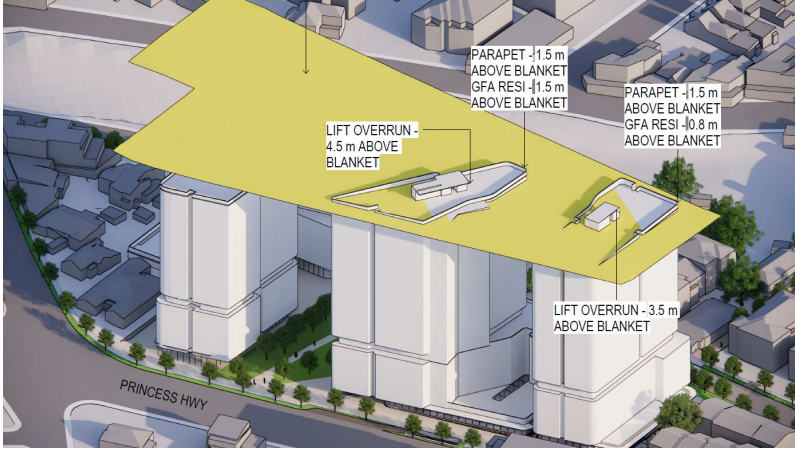
The proposed development will seek to utilise this floorspace bonus as prescribed under Clause 13 of SEPP ARH. The EIS will detail how this bonus has been applied.

3.4 Rockdale Local Environmental Plan 2011

The *Rockdale Local Environmental Plan 2011* (RLEP 2011) establishes the key land use and built form parameters that apply to the site. The key controls that apply to the site under the RLEP 2011 have been summarised in **Table 2** below.

Table 2 Key applicable RLEP 2011 controls

Control	Commentary
2.1 – Land use zones	<p>The site is zoned B4 Mixed Use under the RLEP 2011. The proposal is consistent with the zone objectives to integrate suitable business, office, residential, retail, and other development in accessible locations to maximise public transport patronage and encourage walking and cycling.</p> <p>The proposed land uses are permissible with consent.</p>

Control	Commentary
4.3 – Height of buildings	<p>The proposed development generally complies with the 70 metre height limit for the site. Minor variations are proposed as a result of accommodating the floor to floor height required for the 1,800m² podium community facility (refer to Figure 4 below). It is considered that the objectives of the FSR development standard will be met notwithstanding the noncompliance, and a Clause 4.6 Variation Request will be prepared and submitted with the Environmental Impact Statement.</p> <p>The community facility will deliver significant material public benefits to Arncliffe, and meets the identified need for a new community facility as outlined in the <i>Arncliffe and Banksia Local Infrastructure Contribution Plan 2020</i>.</p>  <p>Figure 4 Proposed height variation Source: Group GSA</p>
4.4 – Floor space ratio	<p>The proposed GFA excluding the potential combined public library and community facility is approximately 64,499m² which complies with the maximum FSR of 4.8:1. Billbergia are undertaking separate discussions with Council to confirm the inclusion of the combined public library facility in the proposal.</p>
5.10 – Heritage conservation	<p>No heritage items are located on the site and the site is not located within a Heritage Conservation Area. Two local heritage items (dwellings) are located on the western side of Eden Street opposite the site. A Heritage Impact Statement will be submitted with the Environmental Impact Statement.</p>

3.5 Rockdale Development Control Plan 2011

Development Control Plans (DCPs) do not apply to SSD DAs. Therefore, the Rockdale Development Control Plan 2011 (RDCP 2011) does not technically apply to the development.

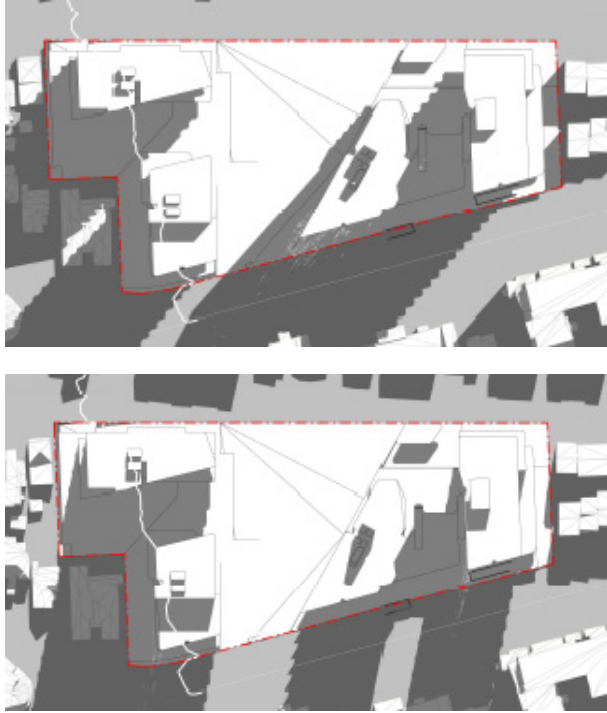
Notwithstanding this, the RDCP 2011 under Section 7.7 contains precinct-specific controls for Arncliffe and Banksia, to guide the future development of the Arncliffe Precinct. A summary assessment against the relevant development controls is provided below.

Table 3 Assessment against RDCP 2011 site-specific controls for Arncliffe Town Centre

Control	Commentary
Desired future Neighbourhood character	
Provide a vibrant mixed use Town Centre, extending along the east side of the rail line, with activity during the day and night.	The proposal will deliver of a vibrant mixed-use centre, including a 4,000m ² park, social and market housing, community centre, childcare centre and retail precinct.

Control	Commentary
Eden Street and Burrows Street become retail streets, complementing Firth Street and extending the Town Centre uses and activity to the east of the rail line. Streetscape improvements delivered alongside development will further enhance the character and amenity of these streets.	The proposed development will incorporate ground floor retail uses extending the Arncliffe Town Centre east of the Railway Station.
Existing and new pedestrian links improve access to the railway station and create a more walkable centre.	The proposed development will significantly improve pedestrian connectivity and permeability and improve pedestrian connectivity between the Railway Station and the Princes Highway.
Eden Street Park is a new local park catering to new residents with a centrally located lawn, gardens and significant tree planting.	The proposed development will provide a new 4,000m ² public park.
Taller buildings near the station visually reinforce the area as a centre and assist in highlighting the location of key connections and open spaces.	The proposed development includes tall buildings that highlight the location of the park and the proximity to the Railway Station.
Land use	
Ensure retail and business uses are provided at the ground level of existing and planned retail streets particularly on Eden Street and Burrows Street and sites adjoining Wooroona Reserve to the east.	A public meeting plaza and retail uses are proposed along Eden Street.
Development adjoining Princes Highway and parts of Eden Street should provide showroom and other commercial uses at lower levels.	
High-quality residential development is encouraged above retail and commercial uses within the town centre, and as a standalone use on sites outside of the centre.	Architecturally designed residential apartments are proposed above the podiums.
Built form	
Tall towers on larger sites should be slender and well proportioned.	The proposed towers are slender and well proportioned.
Provision of high quality residential amenity in terms of privacy and built form by complying with SEPP 65 - Design Quality of Residential Apartment Development and Apartment Design Guide.	The proposed residential towers will comply with SEPP 65 and its accompanying Apartment Design Guide, providing a high level of residential amenity. A complete assessment will be provided with the EIS.
Side setbacks are to include deep soil zones and appropriate landscaped treatment.	As shown in the Urban Design Report at Attachment A , the proposed development will incorporate 7% of the site area as deep soil zones in accordance with the Apartment Design Guide. Landscaping will be integrated throughout the development at ground, podium and roof levels.
A front setback of 3 metre is required, unless a specific setback is recommended in 4.1 Building Setback of this chapter.	As shown in the indicative Architectural Plans within the Urban Design Report at Attachment A , the proposed development will provide a setback of generally 3 metres or more to Eden Street, and a 6 metre setback to the Princes Highway.
Public domain	
6 metre setback and provision of a positive covenant applying to this setback, for the purposes of permitting unrestricted access for public thoroughfare, landscape and public domain maintenance on sites adjoining the Princes Highway. Where a site has more than one frontage, this requirement shall apply to each street frontage. Proposed landscape improvements include significant 'boulevard tree planting and the creation of a dual footpath that allows for the staged delivery of the setback and continued pedestrian access during transition.	As shown in the indicative Architectural Plans within the Urban Design Report at Attachment A , the proposed development will provide a 6 metre setback to the Princes Highway. Significant landscaping improvements are also provided at the site.
A new park to be delivered through the redevelopment of the Housing NSW site on Eden Street.	The proposed development will deliver a new high quality 4,000m ² public park.

Control	Commentary
New through site links between Princes Highway and Eden Street.	The proposed development will provide through site links that significantly improve pedestrian connectivity and permeability between the Princes Highway and Eden Street.
Site specific controls – Eden Street Development Site, Arncliffe Town Centre	
Ensure the new public park is to be located to maximise solar access;	The park will have excellent solar access throughout the year (refer to Figure 5 below).
Provide a minimum width of 50m along the Eden Street frontage with a site area of 4000m ² ;	The proposed park is 4,000m ² and has a width of 70 metres along Eden Street.
Ensure direct through site links are incorporated within the new park and integrate with the new space into the surrounding streetscape;	The park includes through site links between Eden Street and the Pacific Highway.
Ensure new through site links will be provided in accordance with the diagrams on pages 7 106 and 7 107	As shown in the Urban Design Report at Attachment A , the new through site links will be provided generally in accordance with Council's diagrams.
Provide pathway connections through the public park connecting Princes Highway to Eden Street and Arncliffe Station	The park includes through site links between Eden Street and the Pacific Highway.
Ensure a generous landscape interface to Princes Highway with existing trees, additional tree planting, garden zones that must incorporate storm water treatment gardens	As shown in the Urban Design Report, the Princes Highway (and Eden Street) interfaces will feature generous and extensive site landscaping works.
Provide landscape setbacks as per "Figure 7.7.13 Public Domain and Open Space Network Diagram" on page 7 87	Landscape setbacks are proposed consistent with the diagram.
Ensure the new park will play a key role in the community providing new landscaping and areas for passive and active recreation activities	The new park will be the central focus of the new Eden Street community and has been designed to accommodate passive and active recreation.
Ensure building setbacks and site through links are in accordance with "Figure 7.7.42 Built Form and Character" on page 7 109 and through site links as shown on page 7 106 and 7 107	The proposal complies with the building setbacks to the Princes Highway and provides a through site link in accordance with the DCP. The building setback to Eden Street is proposed to be a minimum of 3 metres. The Environmental Impact Statement will include an impact assessment of the proposed setback on the public domain amenity.

Control	Commentary
<p>The configuration of buildings and structures must ensure that a minimum of 50% of the area of parks and green spaces receive a minimum of 3 hours during lunch hours (12pm - 2pm) on 21 June (mid winter)</p>	<p>Overshadowing diagrams have been prepared by Group GSA and are included in the Urban Design Report at Attachment A. The park is sited to ensure overshadowing is minimal, and >50% of the park is capable of receiving a minimum of 3 hours sunlight during lunch hours at mid-winter (refer to Figure 5 below).</p>  <p>Figure 5 Mid-winter shadow analysis at 12pm (top) and 2pm (bottom) Source: Group GSA</p>
<p>Promote slender buildings, towers exceeding 8 storeys should have maximum floor plates of 800m² gross floor area</p>	<p>The proposed towers are slender in nature and do not have a maximum floor plate greater than 800m².</p>

3.6 SEPP 65 and Apartment Design Guide

The EIS will include a design statement addressing the nine design quality principles within *State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Buildings* (SEPP 65). A full assessment against the design criteria within the NSW Apartment Design Guide will also be provided. In summary:

- 25% of the site area is communal open space (refer to Drawing DA-4200 of **Attachment A**).
- 50% direct sunlight is provided to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm in midwinter (refer to Drawing DA-4201 of **Attachment A**).
- 60% of all apartments achieve cross ventilation (refer to Drawing DA-4400 of **Attachment A**).
- 70% of all apartments receive a minimum of 2 hours direct sunlight between 9am and 3pm midwinter (refer to Drawing DA-4450 of **Attachment A**).

3.7 Other planning policies

There are a range of other Environmental Planning Instruments and Policies that will need to be considered as part of the EIS, including:

- *State Environmental Planning Policy No. 55 – Remediation of Land*;
- *State Environmental Planning Policy (Infrastructure) 2007*;
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*;
- *State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Buildings*;
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*;
- *Greater Sydney Region Plan – A Metropolis of Three Cities*;
- *Our Greater Sydney 2056 – Eastern City District Plan* (including housing targets);
- *Future Transport 2056*;
- *NSW State Plan 2021* (including Premier's Priorities);
- *Bayside Local Strategic Planning Statement*;
- *Bayside Community Strategic Plan*;
- *Guide to Traffic Generating Developments*; and
- *Future Directions for Social Housing in NSW*.

4.0 Overview of likely environmental impacts

Based on our preliminary environmental assessment, the following are the key environmental assessment and planning issues that will need to be considered as part of the future SSDA.

4.1 Consistency with strategic and statutory plans

The EIS will outline the proposed development and analyse how the proposal is consistent with the strategic planning framework and context as outlined in **Section 3** above.

As noted in **Section 3.3** above, this will include a detailed description and analysis of all land uses proposed, in addition to the proposed gross floor area that can be achieved under the RLEP 2011 and bonuses permitted under SEPP ARH.

4.2 Urban design and built form

The EIS will assess the height, density, and overall bulk and scale of the proposed development within the context of the locality, including how successfully the proposal integrates with the local environment and its consistency with Arncliffe's desired future character. The EIS will address how the form, layout, and siting of the buildings will achieve optimal design and amenity outcomes.

4.3 Community integration

The EIS will provide a strategy for how the development of the site will achieve a truly integrated community of both private market and social housing at the site. The strategy will include:

- Details of the community housing provider/s (Evolve Housing).
- The mixture of housing (private v. social) to be provided.
- Community consultation to be undertaken, including:
 - Identification of key stakeholders; and
 - Methods of engaging with the key stakeholders.
 - Feedback.

4.4 Traffic, access, and parking

A Preliminary Traffic Statement has been prepared by Stanbury Traffic Planning and is appended to this report at **Attachment C**. The statement confirms that the proposed parking and access arrangements are appropriate.

Furthermore, traffic, access, and parking considerations will form a key part of the EIS, considering the proposal's significant intensification of land uses at the site. A detailed Traffic and Parking Assessment will accompany the EIS and will assess the following:

- Traffic impacts on the surrounding road network and performance of intersections.
- Car parking provision.
- Design and operation of the basement car park.

4.5 Residential amenity

The EIS will demonstrate that the proposed development will be capable of compliance with the relevant residential amenity outcomes, including a detailed assessment for consistency with that of *State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Buildings* (SEPP 65) and accompanying NSW Apartment Design Guide.

4.6 Impacts on adjoining properties

The EIS will consider and assess impacts on surrounding properties, in particular residential properties. This includes solar access, privacy, and overshadowing. The assessment will consider how the built form has been designed to minimise adverse impacts on surrounding sensitive receivers, and how these impacts will be further mitigated.

4.7 Tree removal and biodiversity

The EIS will include an Arborist's Report that will detail any tree removal and impacts on existing flora and fauna at the site, and how these impacts will be managed and mitigated.

4.8 Ecologically sustainable development

The EIS will address principles of Ecologically Sustainable Development (ESD) and include an assessment confirming compliance with the provisions of *State Environmental Planning Policy (Building Sustainability Index: Basix) 2004* and other relevant ESD and building sustainability guidelines.

4.9 Geotechnical and contamination

The EIS will be accompanied by a Geotechnical Investigation to address the requirements of any SEARs, in addition to a preliminary site investigation accordance with *State Environmental Planning Policy No. 55 – Remediation of Land*.

4.10 Noise and acoustics

The EIS will include an Acoustic Assessment to determine that the level of acoustic amenity is appropriate for both future occupants of the site and surrounding sensitive users, during both the construction and operational phases of the development.

4.11 Accessibility

The EIS will include an Accessibility Statement to determine the proposed development's capability of achieving compliance with relevant accessibility guidelines and standards, including that of the *Disability (Access to Premises-Buildings) Standards 2010* (Premises Standards) under the *Disability Discrimination Act 1992*.

4.12 Crime and public safety

A CPTED report will be provided for the development, outlining key Crime Prevention Through Environmental Design (CPTED) principles to be utilised on-site to minimise opportunities for crime and improve public safety. This may include initiatives such as passive surveillance, access control, space management, and territorial reinforcement.

4.13 Other issues for consideration and assessment

In addition to the above, the following will also be considered as part of the EIS:

Site suitability and public interest

The EIS will include a detailed assessment on the suitability of the site for the proposal. This will consider existing site conditions and wider context, as well as future conditions and context of the site. It will also include an assessment on whether the proposal would be in the public interest.

Social and economic impacts

The EIS will make an assessment against the potential positive and negative social and economic impacts (and the significance of these impacts) arising from the proposal, considering potentially affected stakeholders and communities.

Waste management

A detailed Waste Management Plan will be prepared and submitted with the EIS. It will outline the anticipated quantities and streams of waste generated by the proposal during construction and operation, and the intended management of waste in terms of storage, removal off-site and disposal.

Building codes compliance

The EIS will be accompanied by a Building Code of Australia (BCA) and Fire Safety Report prepared by specialist consultants, confirming the development's compliance with the BCA and other relevant codes and standards.

5.0 Engagement

A comprehensive programme of communication and engagement with relevant stakeholders will occur during the preparation of the EIS, which will include Commonwealth, State and Local authorities, service and utility providers, existing residents, surrounding landowners and local community. The engagement process and the issues and comments raised during this process will be documented and addressed within the EIS.

The proponent intends to consult with the following parties in particular:

- Department of Planning, Industry and Environment.
- Bayside Council.
- Utility providers including Sydney Water and Endeavour Energy.
- Telstra / NBN Co.
- Transport for NSW.
- Existing residents of the site.
- Existing residents of the surrounding area; and
- Existing landowners and business owners in the surrounding area.

6.0 Conclusion

This submission provides information to assist in the preparation of the Secretary's Environmental Assessment Requirements (SEARs) for the proposed redevelopment of land located at 26-42 Eden Street and 161-179 Princes Highway, Arncliffe. The proposal's intention is to revitalise the site to become a mixed-use precinct with community, residential and retail land uses, with both market and social housing, as part of the Land and Housing Corporation (LAHC)'s 'Communities Plus' initiative.

As the proposal is for the purposes of development on or on behalf of LAHC with a capital investment value of more than \$30 million on an State Significant Development Site, the Eden Street site, it is State Significant Development (SSD) by virtue of Clause 10 of Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP).

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 me on 9956 6962 or jmurray@ethosurban.com.

Yours sincerely,



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