

25099

3 October 2025

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

Dear Kiersten,

## State Significant Development Scoping Report – Early Works 9-11 Mawson Avenue, Bella Vista

This Scoping Report has been prepared by Beam Planning on behalf of UPG Metro Pty Ltd (UPG) (the Applicant) to request project-specific Secretary's Environmental Assessment Requirements (SEARs) for a State Significant Development Application (SSDA) for early works. The proposed development is to be located at 9-11 Mawson Avenue, Bella Vista (the site).

Specifically, the proposed development will seek consent for the following early works on the site to facilitate a new mixed-use development which is sought concurrently under a separate SSDA:

- Bulk earthworks to enable the construction of the future basement;
- Stabilisation works and construction of retaining structures, including necessary shoring, piling, and cap beam; and,
- Infrastructure services coordination and deviation.

On 8 August 2025, the Housing Delivery Authority (HDA) recommended that the proposed development on the site as outlined in Expression of Interest (EOI) application (259730 - dated 30 April 2025), be declared State Significant Development (SSD) under Section 4.36(3) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Minister for Planning and Public Spaces issued SSD Declaration Order (No 12) 2025 on 21 August 2025, formally declaring the project as SSD. The proposed early works will facilitate the project as declared by the Minister, and will support the timely delivery of the project in accordance with the HDA declaration. The proposed works form an initial stage of the project as declared.

This Scoping Report has been prepared with consideration of the Department of Planning, Housing and Infrastructure's (the Department) *State Significant Development Guidelines (March 2024)*. It provides an overview of the project, sets out the statutory context, and identifies the key likely environmental and planning impacts that will be considered as part of the application.

### The Applicant

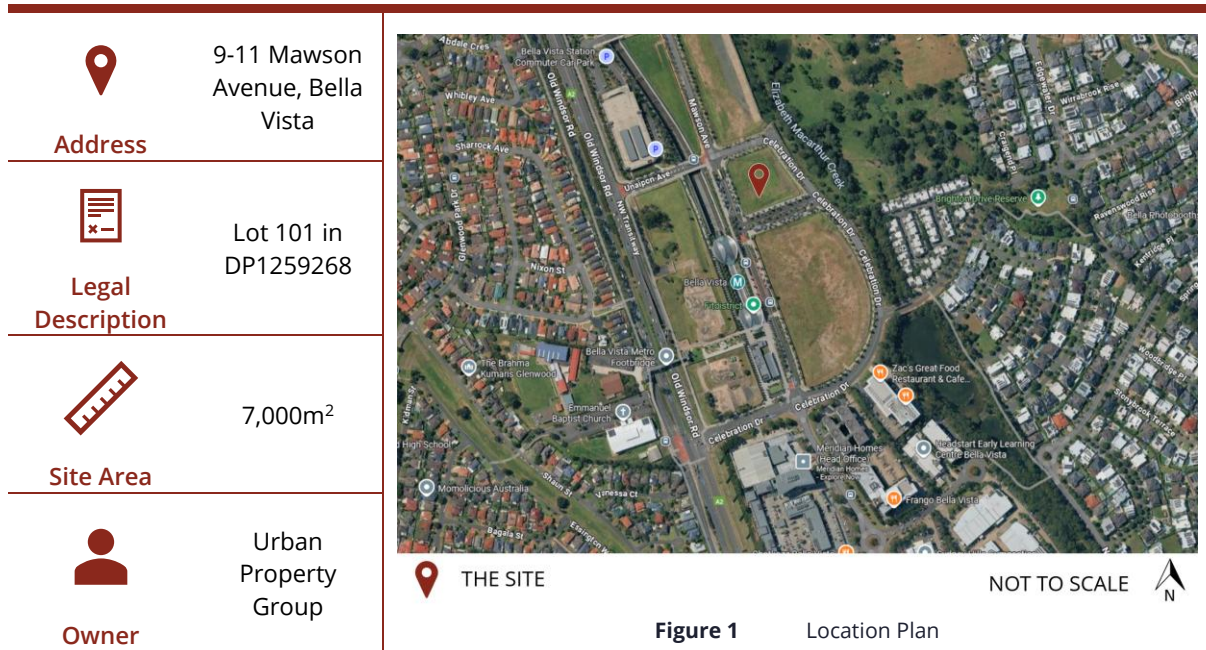
**Table 1** Applicant Details

<b>Applicant</b>	UPG Metro Pty Ltd
<b>ABN</b>	88 685 869 119
<b>Address</b>	Suite 110 Level 1/180-186 Burwood Rd, Burwood NSW 2134

## 1.0 The Site

The site is located approximately 30m from the entrance to the Bella Vista Metro Station, in a highly accessible precinct earmarked for renewal. The site and its surrounds are currently vacant parcels presenting a significant opportunity for coordinated and well-integrated development that can deliver housing and services close to significant transport infrastructure.

Figure 1 provides a location plan, while Figure 2 provides an aerial image of the site.



## 2.0 Background

### 2.1 Planning History

Since 2013, there has been a number of planning milestones which have shaped the planning framework relevant to the site. These milestones are outlined below.

#### North West Rail Link Corridor Strategy

In September 2013, the NSW Government released the *North West Rail Link Corridor Strategy*, which established Structure Plans for the eight new Metro stations, including Bella Vista and Kellyville. The strategy identified the Bella Vista Station Precinct as a key location for transit-oriented development, envisaging a predominantly residential precinct with supporting retail and commercial uses around the station. The Corridor Strategy provided a 20–25 year framework for urban renewal, setting dwelling and employment targets, guiding land use and built form outcomes, and ensuring that new development would leverage the significant public investment in the Sydney Metro Northwest.

#### State-Led Rezoning

Following the Corridor Strategy, a State-led rezoning was undertaken for the Bella Vista and Kellyville Station Precincts. On 1 December 2017, the (then) Minister for Planning approved *State Environmental Planning Policy Amendment (Bella Vista and Kellyville Station Precincts) 2017*. This rezoning facilitated the delivery of up to 8,400 new homes across the two precincts, together with employment zones, mixed-use centres, parks, and community facilities. The rezoning established maximum building heights and floor space ratio controls, provided for improved public open space and transport connectivity, and aligned new growth with the completion of Sydney Metro Northwest infrastructure.

#### Bella Vista Station Precinct Concept Proposal (SSD-10344)

A Stage 1 Concept Proposal (SSD-10344) submitted by Landcom (on behalf of Sydney Metro) was approved in December 2022 for the approximately 33.5 hectares of government-owned land surrounding the Bella Vista Metro Station (refer to **Figure 3**). The Concept development consent SSD-10344 imposes a number of conditions to guide the subsequent detailed SSDAs, including requirements for built form, urban design, public domain, solar access and design excellence. It also incorporates Urban Design Guidelines and a Design Excellence Strategy to guide future applications. The subject site is identified as Site B.04 within the Urban Design Guidelines.

The approved Concept SSDA provides for:

- Up to 3,3804 dwellings, including a minimum of 5% affordable housing for ten years,
- A new primary school for up to 1,000 students,
- A community centre,
- Over 5 hectares of public open space, including parks and connections to Elizabeth Macarthur Creek,
- A built form strategy across 20 development blocks, with building heights up to 68m, and,
- Urban Design Guidelines and a Design Excellence Strategy to guide future detailed applications.

The Concept Proposal was intended to deliver a mixed-use town centre integrated with Bella Vista Metro Station, supported by residential, retail, commercial, community and open space uses. It is noted that this SSDA did not provide consent for any physical works.

It is noted that clause 4.24(4) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) provides a pathway for the consent authority to determine a further development application that is inconsistent with a Concept development consent, provided that a condition is imposed requiring modification or surrender of the relevant part of the Concept Consent. It is anticipated the detailed SSDA would include such conditions requirement amendment of the Concept development consent to align with the detailed built form outcome.



**Figure 3** Bella Vista Station Precinct

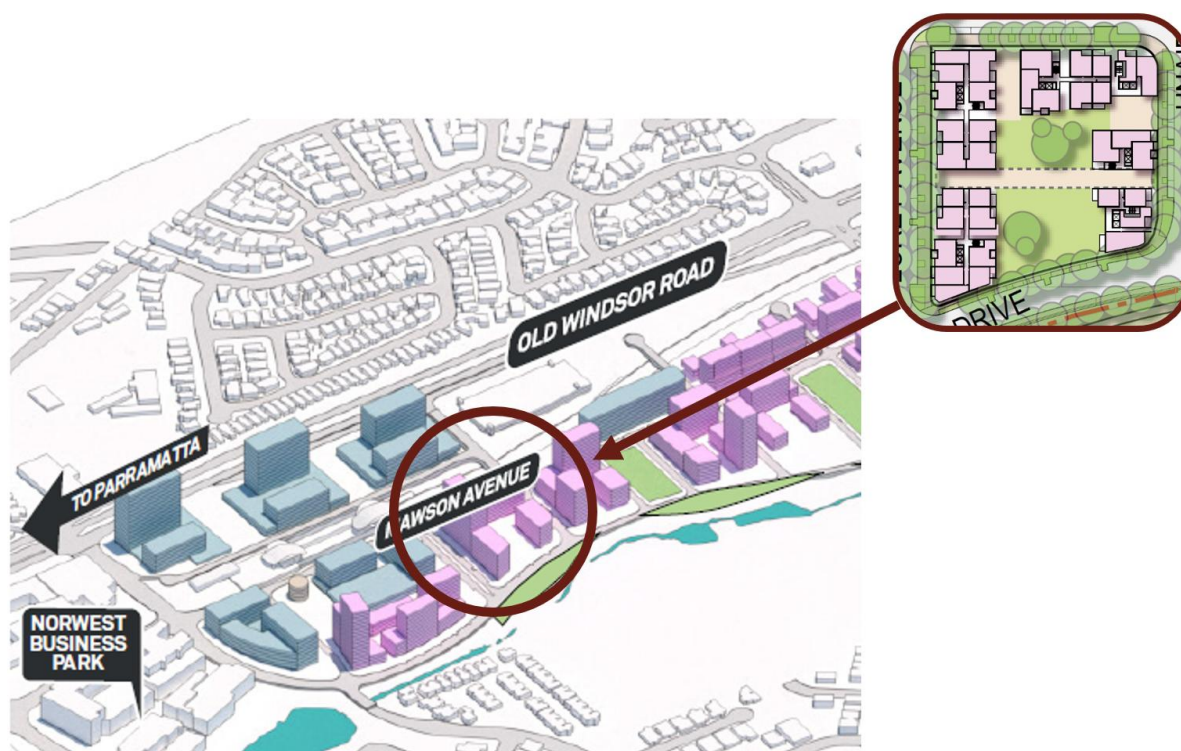
Source: GLN Planning

In relation to the subject site, the concept approved two planning envelopes dissected by a through site link, with the western envelope height at 68m, and the eastern envelope at 40m (refer to **Figure 4**). The concept indicatively approved up to 39,395m<sup>2</sup> of residential floor space, equivalent to a FSR of 5.6:1, and anticipated 500 dwellings (refer to **Figure 5**).



**Figure 4** Land Use Master Plan

Source: Hassell Studio



**Figure 5** Concept Plan Building Envelope

Source: Hassell Studio, edits by Beam Planning

Development consent SSD-10344 has since been modified on four (4) occasions, with details outlined in **Table 2**.

**Table 2** Description of modifications to Development consent SSD-10344

Modification Reference	Description	Status
<b>SSD-10344-Mod-1</b>	Amendments to development block areas and dimensions within stamped plans, Urban Design Guidelines and Urban Design Report.	Approved
<b>SSD-10344-Mod-2</b>	Amend lot areas, lot boundaries and road layout and correct minor errors and inconsistencies in stamped plans, Urban Design Guidelines and Urban Design Report.	Approved
<b>SSD-10344-Mod-3</b>	Correct minor error in Urban Design Guidelines	Approved
<b>SSD-10344-Mod-4</b>	Administrative amendments to the stamped plans, Urban Design Guidelines and Urban Design Report to show correct site area for superlot B2.0 in accordance with the registered lot on title.	Under Assessment

### Tier 1 Accelerated Transport Orientated Development Precinct Rezoning

Bella Vista and Kellyville were identified as an Accelerated Precinct under the Transport Oriented Development program (TOD) (refer to **Figure 6**). In early 2024, the Department began strategic planning investigations to deliver greater housing in the TOD precincts, and a draft rezoning proposal for Bella Vista and Kellyville was made available for public feedback between 9 July and 23 August 2024. In November 2024, the rezoning proposal was finalised, and the amended controls are now in effect.

In relation to the subject site, the following amendments resulted from the TOD program:

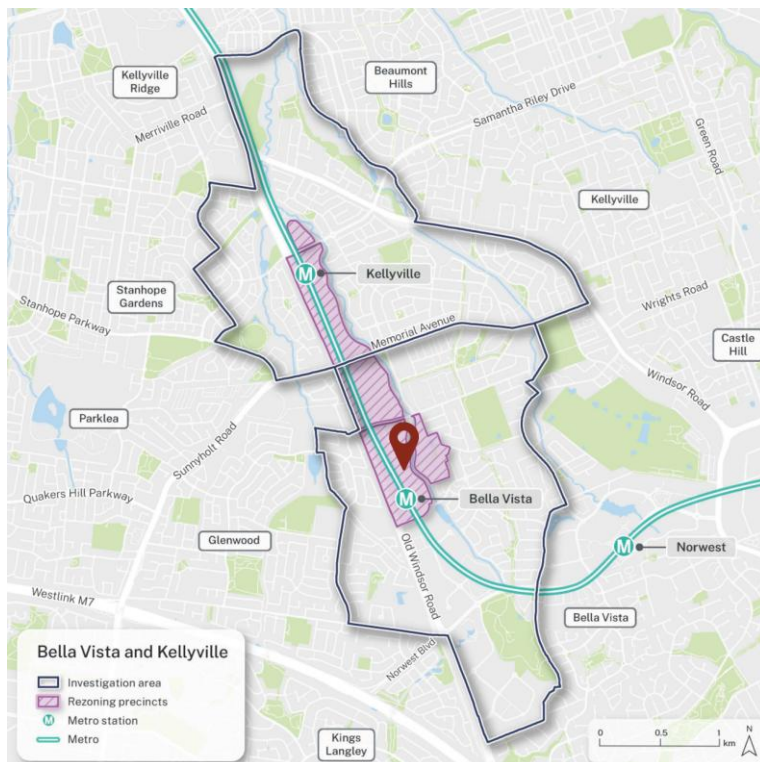
- introduction of a temporary SSD category for residential development above \$60 million (until November 2027);

- removal of in-fill affordable housing bonuses under Chapter 2 of the Housing SEPP and the associated SSD pathway under Section 26A of the Planning Systems SEPP;
- removal of the low- and mid-rise housing reforms;
- temporary exemption of residential development from certain concurrence and referral requirements (until November 2027);
- introduction of a design competition requirement for buildings on the site over 66m or 20 storeys;
- introduction of a temporary alternative design excellence pathways for residential development to avoid the need for a design competition (until November 2027);
- amendment of the mapped height of buildings development standard from 68m (west) / 40m (east) under the Concept SSD to a uniform 73.5m;
- amendment of the mapped FSR from 3.0:1 to 4.9:1;
- introduction of active street frontage controls to Mawson Avenue and the through-site link.

The following key considerations are relevant to the site considering the TOD rezoning:

- The site was not afforded any meaningful uplift under the TOD 1 rezoning. While the mapped FSR was marginally increased to 4.9:1, this represented an effective downzoning compared with the Concept SSD approval, which permitted an FSR of 5.6:1.
- The ability to apply the 30% affordable housing bonus under Clause 16 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) was removed as part of the TOD rezoning, further reducing potential capacity and eliminating incentives for the delivery of affordable housing.
- The site was afforded only a minimal height increase, from 68m/40m under the Concept SSD to a uniform 73.5m, despite surrounding sites in the precinct being upzoned to permit towers of up to 100m.
- This has created an inconsistency between the approved Concept development consent (SSD-10344) and the HLEP controls, with the latter reducing the dwelling yield of the site, notwithstanding that it is one of the closest development parcel to Bella Vista Metro Station.

The revised height and FSR provisions under TOD 1 have, in effect, reduced the development potential of the site while simultaneously providing no mechanism or incentive to deliver greater affordable housing.



 THE SITE

NOT TO SCALE



**Figure 6** Bella Vista and Kellyville Accelerated TOD Precinct

Source: DPHI

## 2.2 Future Detailed SSDA and Concurrent Rezoning

A future detailed SSDA and concurrent Rezoning Proposal will be prepared to seek consent for a mixed use development on the site in accordance with the HDA declaration.

Specifically, the proposed development will comprise approximately 900 dwellings across two (2) buildings ranging up to 40-storeys in height, including a minimum of 15% affordable housing (approximately 135 dwellings). The proposal will incorporate ground floor retail and commercial uses (anticipated to include a supermarket, gym and childcare), a through-site pedestrian link, and a total gross floor area (GFA) of approximately 71,000m<sup>2</sup>. The site is located immediately adjacent to Bella Vista Metro Station and the proposal is intended to deliver a high-quality, sustainable, mixed-use outcome that will act as a catalyst for the delivery of the long-planned Bella Vista Station Precinct around the significant Metro investment.

To facilitate this development, a concurrent Rezoning Proposal will be prepared to seek the following amendments to the HLEP:

- increase the maximum building height from 73.5m to ~140.4m across the site (to be redefined as the proposal progresses); and
- increase the maximum FSR on the site from 4.9:1, to ~10.16:1 (to be redefined as the proposal progresses).

The proposed amendments seek to optimise the site's strategic location within the Bella Vista Metro Precinct by enabling high-density, transit-oriented development near key infrastructure and public transport. The amendments will facilitate an uplift in housing supply, including a commitment to deliver a minimum of 15% affordable housing for ten years, while supporting the site's function as a mixed-use precinct through the integration of ground-level retail and non-residential uses.

## 3.0 Strategic Context

The proposed early works will facilitate the timely commencement of construction and support the delivery of the mixed-use development, while aligning with and giving effect to the strategic planning framework relevant to the site, as evidenced by the acceptance of the proposal by the HDA and its declaration as SSD.

If approved, the broader project will deliver approximately 900 new dwellings in a highly accessible location within Sydney's Northwest, within walking distance of Bella Vista Metro Station, together with a range of significant public domain improvements. The proposal directly responds to the current housing crisis and advances the State's commitments under the National Housing Accord, underscoring the urgency of delivering new housing supply.

### 3.1 Key Strategic Plans

The following key strategic plans are likely to be relevant to the justification and evaluation of the project and will be investigated in more detail in the EIS:

- NSW State Priorities;
- National Housing Accord 2022;
- NSW Housing Strategy: Housing 2041;
- NSW Government Housing Targets;
- State Infrastructure Strategy;
- Future Transport Strategy;
- Better places: An Integrated Design Policy for Built Environment of NSW;
- Development near Rail Corridors and Busy Roads;
- RMS Guide to Traffic Generating Development;
- Greater Sydney Region Plan – A Metropolis of Three Cities;
- Our Greater Sydney 2056 Western City District Plan;
- North West Rail Link Corridor Strategy;
- Hills Future 2036 – Local Strategic Planning Statement;
- The Hills Corridor Strategy 2015;
- Norwest Strategic Centre Precinct Plan;
- Hills Shire Council's Housing Strategy;

- Hills Shire Council's Recreation Strategy;
- Hills Shire Council's Productivity and Centres Strategy;
- Hills Shire Council's Integrated Transport and Land Use Strategy; and,
- Hills Shire Council's Environment Strategy.

### 3.2 Cumulative Impacts

The proposed Early Works SSDA is limited to bulk excavation and basement establishment works. As such, cumulative impacts are expected to be limited and primarily associated with short-term construction activities.

The works may contribute to localised traffic, noise, dust, and vibration impacts when considered alongside other nearby construction projects within the Bella Vista Station Precinct. These impacts will be temporary in nature and appropriately managed through construction management measures.

### 4.0 The Proposal

The proposed SSDA will seek development consent for early works associated with the mixed use development outlined in **Section 2.2** and HDA EOI 259730. The SSDA, if approved will facilitate the delivery of a high-density, transit-oriented mixed-use development, including approximately 900 dwellings, retail and commercial uses, and significant public domain improvements.

Specifically, the objective of this proposal is to undertake bulk excavation and basement establishment works to ready the site for construction of a basement and mixed-use development.

Development consent will be sought for the following:

- Bulk earthworks to enable the construction of the future basement;
- Stabilisation works and construction of retaining structures, including necessary shoring, piling, and cap beam; and,
- Infrastructure services coordination and deviation.

### 5.0 Consideration of Alternatives

A range of development options have been considered during the planning process to determine the most appropriate outcome for the site. These options were evaluated in terms of feasibility, merit, urban design outcomes and broader community benefit.

The following alternatives were considered as part of the process leading to this proposal, and will be discussed in further detail in the EIS:

- **Alternative 1:** Do Nothing (consolidation of early works and construction stages) - Under this approach, early works would be incorporated into the future detailed SSDA. This would result in delays to the commencement of works on the site, a longer construction program, and reduced certainty in delivery timeframes, which is inconsistent with the urgent need to accelerate housing supply.
- **Alternative 2:** Proposed Early Works - Proceeding with a separate Early Works SSDA enables bulk excavation and basement establishment to be undertaken in advance of the detailed SSDA. This approach ensures timely commencement of construction, supports efficient project staging, and facilitates the delivery of the mixed-use development in line with the objectives of the HDA and the National Housing Accord.

## 6.0 Statutory Context

**Table 3** provides an overview of the key statutory requirements for the project.

**Table 3** Statutory Context

Matter	Comments
<b>Power to Grant Consent</b>	<p>The development is declared SSD pursuant to State Significant Development Declaration Order 2025 (No 12, Part 2, Section 1(f).</p> <p>Pursuant to Section 4.5(a) of the EP&amp;A Act, the Minister for Planning and Public Spaces, or their delegate will be the consent authority for the application.</p>
<b>Permissibility</b>	<p>The proposal is located on land which is subject to the HLEP, which zones the site as E1 Local Centre. This zone permits a broad range of land uses to support mixed use development including shop top housing, centre-based child care facilities, recreation facilities (indoor) and commercial premises. The proposed works are associated with the future mixed use development which is to be assessed under a separate detailed SSDA.</p> <p>The development is permitted with consent in this zone.</p>
<b>Other Approvals</b>	<ul style="list-style-type: none"> <li>• <b>Biodiversity Conservation Act 2016</b> – Due to the nature of the site, a waiver to the requirement for a Biodiversity Development Assessment Report (BDAR) will be sought prior to lodgement of the SSDA.</li> <li>• <b>Water Management Act 2000</b> – Authorisation would be required if groundwater is to be impacted during construction.</li> <li>• <b>Sydney Water Act 1994</b> - Section 78 of the <i>Sydney Water Act 1994</i> requires consent authorities to notify Sydney Water where an application for development could affect Sydney Water services. Accordingly, the applicant will consult with Sydney Water during the preparation of the EIS if deemed necessary.</li> </ul> <p><u>Approvals not applicable:</u></p> <ul style="list-style-type: none"> <li>• An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i>; and,</li> <li>• An approval under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i>.</li> </ul>
<b>Pre-conditions to exercising the power to grant consent</b>	<p><b>Biodiversity Conservation Act 2016</b> (BC Act) A BDAR waiver will be requested from the Department to satisfy Section 7.9(2) of the BC Act.</p> <hr/> <p><b>National Parks and Wildlife Act 1974</b> (NPW Act) The NPW Act aims to prevent the unnecessary or unwarranted destruction of relics and the active protection and conservation of relics of high cultural significance. Given the historic work undertaken as part of the Concept Plan and the extensively disturbed nature of the site, a full Aboriginal Cultural Heritage Assessment Report (ACHAR) is not considered necessary for this site. Therefore, an Aboriginal Cultural Due Diligence Report will be prepared instead to accompany the application.</p> <hr/> <p><b>State Environmental Planning Policy (Transport and Infrastructure) 2021</b> (Transport and Infrastructure SEPP) <u>Section 2.98 Development adjacent to rail corridors:</u> Section 2.98 applies to development on land that is in, or adjacent to a rail corridor if the development is likely to have an adverse effect on rail safety, involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, involves the use of a crane in air space above any rail corridor, or is located within 5 metres of an exposed overhead electricity power line that is used for the purpose of railways or rail infrastructure facilities. Before determining a SSDA for such development, the consent authority must refer the application to the rail authority. The SSDA will be referred to the rail authority for comments.</p> <hr/> <p><u>Section 2.99 Excavation in, above, below or adjacent to rail development</u> Section 2.99 applies to development that the penetration of ground to a depth of at least 2m below ground level (existing) on land within 25m of the rail corridor. Before determining a future application on the site the consent authority must give written notice of the application to the rail authority and take into consideration any response that is received.</p>

Matter	Comments
	<p><b>State Environmental Planning Policy (Resilience and Hazards) 2021</b> (Resilience and Hazard SEPP)</p> <p>Chapter 4 of the Resilience and Hazard SEPP aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Specifically, Section 4.6(1)(b) requires the consent authority to be satisfied that the land is suitable in its contaminated state, or will be suitable after remediation, for the purpose for which the development is proposed to be carried out.</p> <p>Many contamination studies and environmental site investigations have been undertaken to assess the extent and nature of contaminants through the approved Concept Plan. Whilst this will be addressed in the upcoming SSDA, the question of contamination has been effectively resolved through existing approvals which cover the entire subject site.</p>
<p><b>Mandatory matters for consideration</b></p>	<p><b>State Environmental Planning Policy (Transport and Infrastructure) 2021</b> (Transport and Infrastructure SEPP)</p> <p>The future SSDA will address the following sections of the Transport and Infrastructure SEPP:</p> <ul style="list-style-type: none"> <li>• Section 2.98 Development adjacent to rail corridors</li> <li>• Section 2.99 Excavation in, above, below or adjacent to rail corridors</li> </ul>
	<p><b>State Environmental Planning Policy (Housing) 2021</b> (Housing SEPP)</p> <p>The future SSDA will give regard to the Housing SEPP and will address car parking provisions in the context of the proposed basement excavation.</p>
	<p><b>Hills Local Environmental Plan 2019</b> (HLEP)</p> <p>The proposed early works will give regard to the following development standards, along with the following relevant clauses:</p> <ul style="list-style-type: none"> <li>• Clause 7.2 Acid sulfate soils</li> <li>• Clause 7.2 Earthworks</li> <li>• Part 8 Bella Vista and Kellyville Station Precincts</li> </ul>
	<p><b>Bella Vista Station Precinct Concept Proposal (SSD-10344)</b></p> <p>It is noted that the Stage 1 Concept Approval will be amended via conditions imposed in the modification to the detailed DA, as per clause 4.24(4) of the EP&amp;A Act (<b>bolded</b> below):</p> <p><b>4.24 Status of concept development applications and consents</b></p> <p><i>(1) The provisions of or made under this or any other Act relating to development applications and development consents apply, except as otherwise provided by or under this or any other Act, to a concept development application and a development consent granted on the determination of any such application.</i></p> <p><i>(2) While any consent granted on the determination of a concept development application for a site remains in force, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site (the concept consent).</i></p> <p><i>(3) Subsection (2) does not prevent the modification in accordance with this Act of a consent granted on the determination of a concept development application.</i></p> <p><b>(4) Subsection (2) does not prevent the determination of a further development application for the site that is inconsistent with the concept consent if the consent authority determines the application by granting development consent subject to a condition requiring the modification or surrender of the concept consent.</b></p>
	<p><b>Bella Vista and Kellyville TOD Precincts Design Guide</b></p> <ul style="list-style-type: none"> <li>• Section 3.4 Water Sensitive Urban Design</li> <li>• Section 3.7 Air Quality Management</li> <li>• Section 3.8 Biodiversity</li> </ul>

## 7.0 Community Engagement

Engagement with the relevant government agencies and key surrounding landowners has commenced and will continue to be undertaken in accordance with the requirements of the SEARs. The applicant will also be undertaking future engagement to inform the EIS in accordance with the SEARs and DPHI *Undertaking Engagement Guidelines for State Significant Projects (2021)*.

Consultation is anticipated with the following government and industry stakeholders:

- Department of Planning, Housing and Infrastructure;
- Transport for NSW, including Sydney Metro;
- The Hills Shire Council;
- Neighbouring Landowners;
- Surrounding Residents and Businesses;
- Local Indigenous Community;
- Local Community Groups and Members; and
- Public agencies and utility providers, including Water NSW, Ausgrid, Jemena and Sydney Water.

## 8.0 Proposed Assessment of Impacts

**Table 4** and **Table 5** identify the matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters. The concurrent assessment of the Planning Proposal and SSDA will ensure that all key matters are able to be comprehensively addressed in a unified manner under a single assessment and consent authority.

**Table 4** Matters of consideration applicable to the site requiring further assessment

Assessment Matter	Proposed Approach
Contamination	Many contamination studies and environmental site investigations have been undertaken to assess the extent and nature of contaminants through the approved Concept Plan. Whilst this will be addressed in the upcoming SSDA, the question of contamination has been effectively resolved through existing approvals which cover the entire subject site.
Infrastructure	A Utilities and Infrastructure Assessment will be prepared and submitted as part of the EIS. The assessment will identify existing services and assess potential impacts of the proposed early works on existing utility infrastructure and service provider assets in proximity to the proposed works, and in consultation with relevant service authorities.
Water	An Integrated Water Management Plan (IWMP) will be prepared which provides a framework for how water resources will be managed during early works activities.
Geotechnical Conditions	Geotechnical Assessment will be prepared to support the SSDA, as the proposal involves excavation for basement structures. The assessment will identify the subsurface conditions of the site.
Stormwater Management	Stormwater impacts associated with the proposed early works will be assessed by a qualified consultant and the assessment will be provided with the submission of the EIS. A Stormwater Management Plan and Sediment & Erosion Control Plan will accompany the EIS submission and will provide details regarding proposed onsite stormwater management, as well as any proposed water capture and reuse and erosion and sediment control measures required to mitigate offsite impacts.
Waste Management	A Construction and Demolition Waste Management Plan (Waste Management Plan) will be prepared and accompany the EIS. The Waste Management Plan will detail all likely waste streams to be generated during demolition and construction and outline proposed measures to dispose of the waste offsite. A Preliminary Operational Waste Management Plan is not required to be submitted considering the nature of the works relating to early works only with no operational aspects. All demolition, construction waste will be reused or recycled where possible.

Assessment Matter	Proposed Approach
Noise and Vibration	A Noise and Vibration Impact Assessment will be prepared in accordance with the relevant NSW Environment Protection Authority (EPA) or other relevant industry guidelines and submitted as part of the EIS. The assessment will detail the demolition and construction noise, and vibration impacts on nearby sensitive receivers and structures and will outline the proposed management and mitigation measures to be implemented.
Traffic and Parking	Preliminary Construction Pedestrian and Traffic Management Plan will also be prepared as part of the EIS documentation which will outline proposed traffic control and pedestrian management plans, construction vehicle movements / routes and how any potential impacts on the surrounding movement networks would be managed and mitigated during construction phase of the works.
Construction Impacts	<p>A Preliminary Construction and Environmental Management Plan (CEMP) will be prepared and provided as part of the EIS. The CEMP will detail:</p> <ul style="list-style-type: none"> <li>• Timing of construction works to be undertaken;</li> <li>• Construction hours of operation and programme (including any staging);</li> <li>• Site establishment zone and temporary structures (e.g. site accommodation);</li> <li>• Plant and materials handling strategy;</li> <li>• Construction traffic and pedestrian, noise and vibration, soil erosion, air quality and dust control and stormwater management;</li> <li>• Environmental management strategies during construction; and</li> <li>• Waste management.</li> </ul>
Rail Interface	<p>For an Early Works SSDA involving excavation and bulk earthworks near a rail corridor in NSW, there are specific rail interface reporting and coordination requirements that must be addressed to satisfy both the DPHI and the relevant rail authority (e.g. Transport for NSW, Sydney Trains, ARTC, or Metro).</p> <p>These requirements are focused on ensuring rail infrastructure is protected, safety risks are mitigated, and early works are compatible with rail operations. The level of detail required at early works stage reflects the potential impacts of ground disturbance, vibration, drainage changes, and construction proximity to operational rail assets.</p> <p>Rail Interface Statement is to be prepared where works are within the rail influence zone (typically 25–50m of corridor edge or as specified by TfNSW/Sydney Trains). The content includes:</p> <ul style="list-style-type: none"> <li>• Overview of the proposed early works (excavation volumes, depths, methods, staging).</li> <li>• Proximity of works to rail assets (tracks, embankments, retaining walls, signalling).</li> <li>• Identification of interface risks (e.g. vibration, slope instability, overland flow).</li> <li>• Coordination steps taken or planned with the relevant rail authority.</li> <li>• Summary of approvals or consents required from rail authorities under asset protection agreements.</li> </ul> <p>A Rail Safety and Impact Assessment may also be required. This assessment is a formal process to identify and manage risks associated with rail operations.</p>
Electrolysis Assessment	<p>If required by Sydney Metro an Electrolysis Assessment which identifies the risk of corrosion caused by stray current interference from electrified rail lines will be prepared and submitted with the EIS.</p> <p>The assessment should be undertaken in accordance with the NSW Guide for the Measurement of Electrolysis Corrosion Interference and will:</p> <ul style="list-style-type: none"> <li>• Identify potential risks of stray current corrosion affecting adjacent infrastructure</li> <li>• Ensure excavation and earthworks don't interfere with systems</li> <li>• Inform the need for protective measures, monitoring or approvals. "</li> </ul>
Other Technical Report	<p>The EIS is also proposed to be supported by:</p> <ul style="list-style-type: none"> <li>• Survey Plan</li> <li>• Structural Drawings</li> <li>• Rail Interface Statement</li> </ul>

Assessment Matter	Proposed Approach
	<ul style="list-style-type: none"> <li>• Electrolysis Statement</li> <li>• Construction Management Plan, including Construction Traffic Management Plan and Construction Waste Management Plan</li> <li>• Aboriginal Cultural Due Diligence Statement</li> <li>• BDAR Wavier</li> <li>• Noise and Vibration Impact Assessment</li> <li>• Integrated Water Management Plan</li> <li>• Geotechnical Report</li> <li>• Groundwater Impact Assessment</li> <li>• Environmental Site Assessment (Contamination), Remediation Action Plan, and Site Auditor Statement as required</li> <li>• Services and Utilities Report</li> <li>• Estimated Development Cost (EDC) Report</li> </ul>

**Table 5** Matters of consideration not requiring further assessment

Assessment Matter	Proposed Approach
Built form	The proposal seeks consent for early works, therefore does not propose any built form.
Bushfire	The site is not bushfire prone land, therefore no further assessment is required.
Heritage	<p>The site is not located in proximity to any heritage items, therefore no further assessment is required.</p> <p><i>There is a possibility that a full ACHAR will not be required as the site was used as retention pond during the construction of the Metro. Further Landcom commissioned an Aboriginal heritage assessment in 2019 for all of their sites in Bella Vista which found no artefacts on or near our site.</i></p>
Tree Removal	The site has been previously cleared. A BDAR Waiver Request will be prepared and lodged to confirm the site is not subject to any significant biodiversity value prior to lodgement of the SSDA.
Biodiversity	

As outlined in this letter, the Proposal has been declared SSD by the Minister under section 4.36(3) of the EP&A Act under the HDA and is eligible for project-specific SEARs.

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

Kind regards



**Brendan Hoskins**

**Director**

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