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REQUEST FOR INDUSTRY-SPECIFIC SEARS FOR THE PROPOSED MIXED USE DEVELOPMENT AT 116 PENSURST ROAD, NARWEE

1 INTRODUCTION

This scoping letter has been prepared on behalf of Narwee Hotel Operations Trust Pty Ltd and Narwee Hotel Operations Trust (the Proponent) in relation to the land known as 116 Penshurst Road, Narwee.

It has been prepared in support of a request for industry-specific Secretary's Environmental Assessment Requirements (SEARs), under the Rapid Assessment Framework (RAF). The proposed development involves demolition of the existing pub and short-term accommodation and re-development of the site for new high-quality shop-top housing. The proposal incorporates a concurrent spot rezoning to increase the prescribed maximum height.

The proposal's expression of interest (EOI) was accepted by the Housing Delivery Authority on 1 July 2025. The proposal has been declared by the Minister for Planning and Public Spaces as State Significant Development (SSD).

The proposal is considered to meet the criteria for industry-specific SEARs because it:

- Is wholly permissible;
- Would not constitute designated development; and
- Does not comprise a concept development application.

This letter describes the site, the proposal, and the relevant planning framework that applies to enable the issuance of SEARs, which will then guide the preparation of a formal EIS. This letter should be read in conjunction with:

- **Attachment 1** – Concept Architectural Plans, prepared by Furtado Sullivan; and
- **Attachment 2** – Aboriginal Cultural Heritage Due Diligence Advice Letter, prepared by OzArk.

This letter has been prepared by Patch Planning on behalf of the Proponent, whose details are provided in Table 1 below.

Table 1. Proponent Details	
Descriptor	Proponent Details
Proponent	Narwee Hotel Operations Trust Pty Ltd and Narwee Hotel Operations Trust
Postal Address	Level 7 30-32 Carrington Street, Sydney NSW 2000
Nominated Contact	Naomi Ryan, Associate Director nryan@patchplanning.com.au 0415 598 373



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2 SITE DESCRIPTION

The site is located in the suburb of Narwee, within the Canterbury-Bankstown Local Government Area (LGA). It comprises one allotment known as 116 Penshurst Road, Narwee and is legally described as Lot 1 of Deposited Plan (DP) 125330.

The site currently accommodates a pub and accommodation premises known as the Narwee Hotel, a Bottle Mart liquor store, and associated hard-stand parking lot. It is bound by two street frontages, Penshurst Road to the west and Hannans Road to the south.

Land to the north and east comprises low density residential properties and local public reserves. Local retail stores are located to the west, including a pharmacy, convenience store, and café.

Narwee Train Station is located approximately 40 metres (m) south-west of the site, along the Airport & South railway line. An underground pedestrian tunnel extends from Hannans Road beneath the railway line to Hurst Place, providing access to the southern side of the railway line.

Land south of the railway line comprises a mix of local retail and service premises and low-density residential properties. Narwee Public School is located immediately south-west of the Narwee Train Station.

The site is approximately 300m south of the South-Western Motorway and 2.6 kilometres (km) east of Georges River. Refer to Figure 1 for the locality context and Figure 2 for a site aerial.

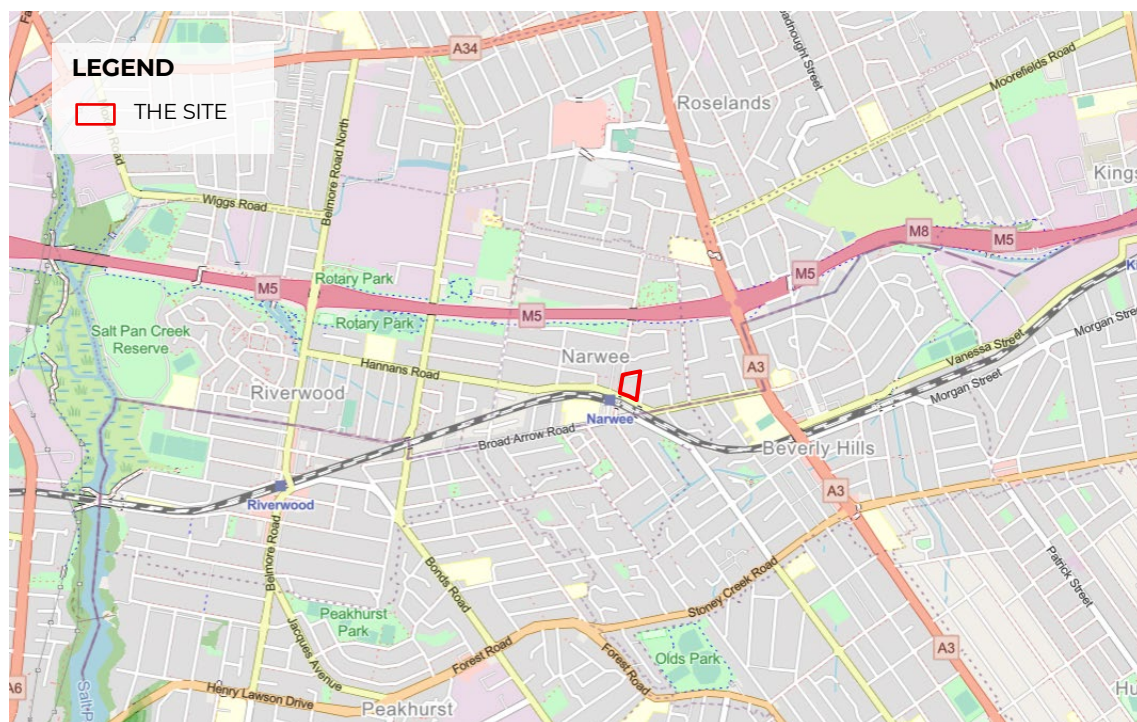


Figure 1. Locality Context Map

Source: SEED Map



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Figure 2. Site Aerial Map

Source: Metro Map, edited by Patch

3 THE PROPOSAL

3.1 BUILT FORM DEVELOPMENT

The proposal comprises the demolition of the existing pub and short-term accommodation (Narwee Hotel) at the site and the redevelopment of the site for high-quality shop-top housing development.

Specifically, the proposed development will include:

- The demolition of the existing pub, short-term accommodation, and bottle shop and excavation of six (6) basement levels.
- Basement level parking will occupy five (5) of these levels, accommodating a total of 259 residential parking spaces and 118 retail parking spaces.
- A 16-storey shop-top development housing development. The ground floor retail and commercial offerings will comprise the pub and associated operations (827.9sqm) and retail premises (167sqm). The basement retail and commercial offerings will comprise the supermarket (1,112.4sqm), bottle shop (109.4sqm), associated staff office (31.7sqm), and back of house operations (554.8sqm).
- Above the ground floor, there will be an additional 15-floors of residential offerings accommodating a total of 181 apartment units. The apartment mix will comprise 25 one-bedroom apartments, 118 two-bedroom apartments, 28 two-bedroom apartments with an additional multipurpose room, and 10 three-bedroom apartments.
- Affordable housing units will comprise 5% of the total yield, resulting in the delivery of nine (9) affordable housing units to be used as affordable housing for a minimum of 15 years.



- This letter is supported by concept Architectural Plans prepared by Furtado Sullivan and provided as **Attachment 1**. Figure 3 and Figure 4 below provide excerpts of the attached plans, including the proposed ground floor layout and a section of the entire development.





- Part demolition existing bottle shop;
- Construction of the southern basement;
- Construction of the ground floor pub, fit-out and retail offering;
- Demolition of the existing pub;
- Construction of the northern basement and southern apartments;
- Construction of the northern ground retail and completion of southern apartments;
and
- Construction and completion of the northern apartments.

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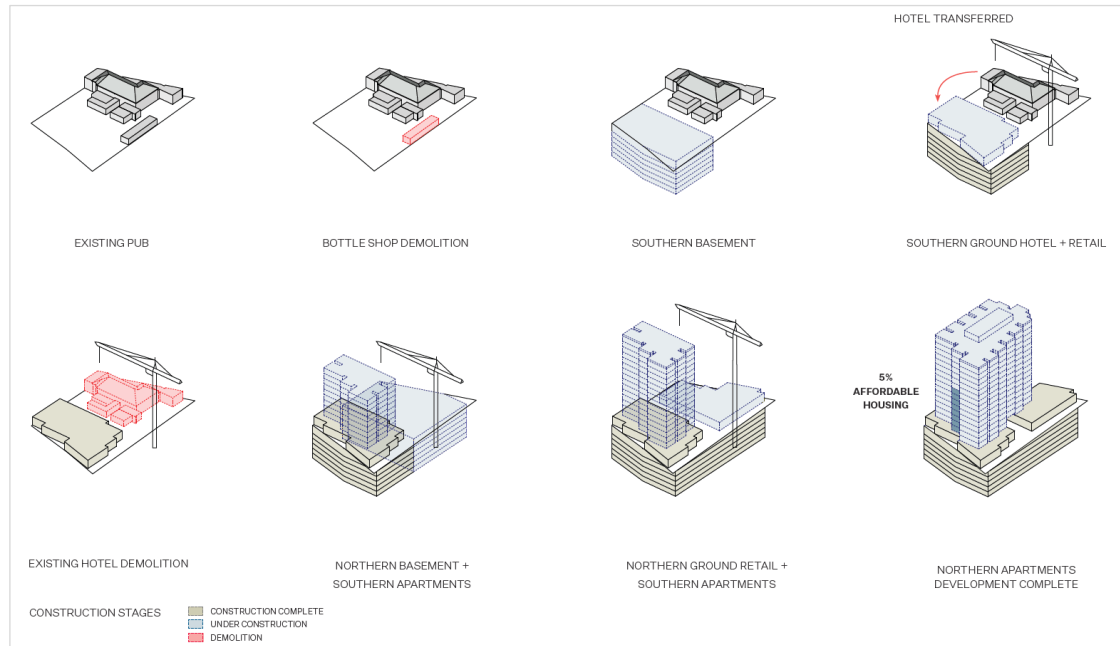


Figure 5. Proposed Construction Methodology

Source: Furtado Sullivan

3.2 CONCURRENT SPOT REZONING (SEPP AMENDMENT)

The site is strategically located within the Narwee local centre in the immediate vicinity of retail, employment, public transport, and recreational areas. The site is zoned E1 Local Centre, the objectives of which are:

- To provide a range of retail, business and community uses that serve the needs of people who live in, work in or visit the area.
- To encourage investment in local commercial development that generates employment opportunities and economic growth.
- To enable residential development that contributes to a vibrant and active local centre and is consistent with the Council's strategic planning for residential development in the area.
- To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.
- To encourage employment opportunities in accessible locations.
- To maximise public transport patronage and encourage walking and cycling.
- To promote a high standard of urban design and local amenity.
- To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.

This proposal clearly aligns with the objectives of the E1, seeking to deliver essential housing in the midst of a national housing crisis within a highly accessible, well serviced area. However, redevelopment opportunities for the site are restricted by an existing maximum building height of 27m.



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The proposal is seeking to undertake a concurrent spot rezoning to achieve a revised height of building restriction of **approximately 57m** (subject to refinement at lodgement). The revised height restriction will allow the site to achieve its optimal redevelopment potential and deliver the maximum number of apartment units without limiting or reducing the amenity of existing development.

4 STRATEGIC CONTEXT

An overview of the projects compliance with the relevant key policies, plans and strategies is provided below.

Table 2. Alignment with Key Strategic Planning Documents

Plan, policy or strategy	Alignment with strategic framework
Federal Context	
National Housing Accord The context and policy position on housing delivery has changed significantly since 2022 with the establishment of the National Housing Accord targets in August 2023. The NSW Government has committed under the National Housing Accord to deliver 377,000 new well-located homes across the state by 2029. The NSW Government has put in place numerous planning policies to assist to shift the dial on housing, including the establishment of the HDA, the transport orientated development (TOD) program and the low to mid rise housing policy.	This development aligns with the National Housing Accord, intending to deliver at least 225 new homes into the Narwee local centre. It seeks to utilise the HDA process to deliver a diversity of housing within an accessible and well-serviced area. The proposal includes a commitment to 5% affordable housing.
Regional Context	
Greater Sydney Region Plan The Greater Sydney Region Plan provides the overarching strategic plan for growth across the Sydney metropolitan area. It sets out a 20-year plan and 40-year vision that seeks to establish Greater Sydney as a metropolis of three cities – the Western Parkland City, Central River City, and Eastern Harbour City. Narwee is situated within the Eastern Harbour City.	The development aligns with the strategic direction and objectives of the Region Plan by seeking to deliver a large number and mix of high-quality housing options within a well-serviced and highly accessible local centre.
District Context	
South District Plan The South District Plan, which forms part of the Eastern Harbour City, sets out a blueprint for the growth and development of the 'South District' which comprises LGAs from Bankstown in the north to Sutherland in the south. The South District forms part of the Eastern Harbour City.	The proposal aligns with the planning priorities set out in the District Plan, noting that it seeks to deliver housing supply, choice, and affordability with access to jobs, services, and public transport.
Local Context	



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Table 2. Alignment with Key Strategic Planning Documents

Plan, policy or strategy	Alignment with strategic framework
Canterbury Bankstown Local Strategic Planning Statement Council adopted the Connective City 2036 Local Strategic Planning Statement (LSPS) in 2023, setting a comprehensive city-wide vision for growth across the Canterbury-Bankstown LGA. The LSPS frames the City's strategic directions and infrastructure priorities out to 2036, including housing, employment, transport, and environmental resilience. While the LSPS identifies a hierarchy of 34 strategic centres to guide growth and provides a framework for Local Environmental Plan (LEP) updates.	Narwee is identified within the LSPS as a village centre providing urban services. Specifically, it is called out as a location that is envisaged to experience an increase in housing due to the nearby rail service. The development aligns with the key housing priorities set out in the LSPS.
Canterbury Bankstown Housing Strategy Council adopted the Canterbury Bankstown Local Housing Strategy (CBLHS) in 2020. The Strategy outlines a broader vision to deliver up to 50,000 new dwellings by 2036 across the LGA. The CBLHS focuses on locating the majority of new housing within centres and areas with access to infrastructure, services and public transport.	The proposed development aligns with the directions of the CBLHS, in particular by seeking to deliver new homes with high amenity in a highly accessible location within the village centre and near Narwee Station.

5 STATUTORY CONTEXT

The key relevant statutory requirements for the project, having regard to the Environmental Planning and Assessment Act 1979 (EP&A Act), other NSW and Commonwealth legislation, and environmental planning instruments are summarised below. The table has been set out in accordance with the *State Significant Development – preparing an environmental impact statement Appendix B to the State Significant Development guidelines* (DPIE 2021d) (EIS Guidelines), to the cover the following:

- Power to grant approval (i.e. approval pathway);
- Permissibility;
- Other approvals; and
- Mandatory matters for consideration.

Detailed consideration of relevant statutory requirements will be provided in the EIS.

Table 3. Statutory Context

Approval	Requirement
Power to grant approval	
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act 1979)	The EP&A Act 1979 is the overarching governing statute for all development in NSW. Pursuant to section 4.36(3) of the EP&A Act 1979, the Minister may declare specified development on land to be State significant development. An EOI (ref. 255017) was submitted for the proposal on 9 April 2025. The proposal was accepted by the HDA on 1 July 2025 as SSD.



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Table 3. Statutory Context

Approval	Requirement
	Pursuant to Section 4.5(a) of the EP&A Act 1979 the applicable consent authority for SSDAs is the Minister.
Permissibility	
Canterbury-Bankstown Local Environmental Plan 2023 (CBLEP 2023)	The site is zoned E1 Local Centre pursuant to the CBLEP 2023. Shop top housing and commercial premises are permitted with consent under the E1 zone. Food and drink premises and retail premises are both considered a form of commercial premises.
Other Approvals	
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)	Under the EPBC Act, any action (development, project, or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) must be referred to the Commonwealth Minister or the Environment. The purpose of referral is to allow a decision to be made as to whether an action requires approval at the Commonwealth level. If an action is considered likely to have a significant impact on MNES, it is declared a 'controlled activity' and formal approval under the EPBC Act is required. The proposal comprises the redevelopment of an existing pub and associated hard-stand car park, with a few trees interspersed around the property. Given the highly disturbed and developed site, it is considered unlikely that the site would comprise any MNES requiring formal Commonwealth approval. Notwithstanding, further ecological investigations will be undertaken as part of the SSDA if required.
<i>Biodiversity Conservation Act 2016</i> (BC Act)	The BC Act and <i>Biodiversity Conservation Regulation 2017</i> (BC Regulation) provides the statutory framework for the maintenance, protection, and conservation of biodiversity in line with the principles of ecologically sustainable development. Part 7 of the BC Act sets out the requirements for biodiversity assessments and approvals under the EP&A Act. Pursuant to section 7.2(1) of the BC Act, development is likely to significantly affect a threatened species if: a) <i>it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or</i> b) <i>the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or</i> c) <i>it is carried out in a declared area of outstanding biodiversity value.</i> Furthermore, section 7.9(2) of the BC Act requires an application to be accompanied by a Biodiversity Development Assessment Report (BDAR) <i>unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.</i>



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Table 3. Statutory Context

Approval	Requirement
	The development is not likely to have any significant impact on biodiversity values as the development involves works to a highly disturbed and impervious-natured site. The site is currently developed as a pub and a hard-stand at-grade car park. The likelihood of any threatened species or populations on the site is low and as such it is considered that the proposal would not result in a significant impact on any biodiversity values. Considering this, a BDAR is not likely to be required, and we anticipate that a BDAR waiver will be submitted alongside the SSDA. This request would seek a waiver of the requirement to submit a BDAR under clause 7.9(2) of the BC Act. This waiver would be obtained prior to the submission of the EIS.
<i>Protection of the Environment Operations Act 1997</i> (POEO Act)	Schedule 1 of the POEO Act sets out the activities requiring an environmental protection license before commencing. An 'activity' is defined in the POEO Act as <i>an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping or a substance or an animal)</i>. The proposal comprises the development of shop top housing and as such, an environmental protection licence is not expected to be required.
<i>National Parks and Wildlife Act</i>	The <i>National Parks and Wildlife Act 1974</i> provides for the regulation and protection of natural and cultural heritage values, including Aboriginal objects, places, or features. A preliminary search of the Aboriginal Heritage Information Management System (AHIMS) confirmed that there are no Aboriginal sites or declared Aboriginal places within 200m of the site. Aboriginal Heritage Due Diligence Advice has been obtained for the development which has concluded that the proposal presents no risk to Aboriginal cultural heritage values, and an Aboriginal Cultural Heritage Assessment Report (ACHAR) would not be necessary. This has been provided as Attachment 2. Confirmation from DPHI that an ACHAR is not required is requested.
<i>Roads Management Act 1993</i> (Roads Act)	The Roads Act provides overarching legislation for the construction and management of public roads. The site abuts Penshurst Road and Hannans Road which are both public roads under the management and ownership of Council. Pursuant to section 138 of the Roads Act, consent is required from Council in order to carry out works in a public road, including works associated with the provision of site vehicle access. The proposed development comprises the widening of the accessway so it is likely that section 138 approval will be required.
<i>Water Management Act 2000</i> (WM Act)	The WM Act is the statutory framework for the protection and management of water sources for present and future generations. It sets out the circumstances in which approval must be obtained from the Minister prior to undertaking a specified activity. Approval is required under section 89 for water use, section 90 relates to water supply work, drainage work, and flood work, and section 91 regulates the carrying out of controlled activities in specified locations.



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Table 3. Statutory Context

Approval	Requirement
	The construction works associated with the proposed basement may alter the water table and require dewatering. As such, it is likely that section 91 approval will be required.
Mandatory matters for consideration	
Environmental Planning and Assessment Act 1979	The EP&A Act 1979 is the overarching legislation for all development within NSW. Pursuant to section 4.36(3), the proposal is considered SSD as declared by the Minister. Section 1.3 – Objects of the Act Section 1.3 sets out the objectives of the EP&A Act 1979. Of relevance are: <i>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i> <i>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i> <i>(c) to promote the orderly and economic use and development of land,</i> <i>(d) to promote the delivery and maintenance of affordable housing,</i> <i>(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i> <i>(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i> <i>(g) to promote good design and amenity of the built environment,</i> <i>(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i> <i>(j) to provide increased opportunity for community participation in environmental planning and assessment.</i> The above objectives will be addressed in the forthcoming EIS. Section 4.15 – Matters for consideration Pursuant to section 4.15(1) of the EP&A Act 1979, a consent authority must take into consideration the following matters when determining a development application: <i>(a) the provisions of—</i> <i>(i) any environmental planning instrument, and</i> <i>(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and</i> <i>(iii) any development control plan, and</i>



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Table 3. Statutory Context

Approval	Requirement
	(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), (v) (Repealed) that apply to the land to which the development application relates, (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, (c) the suitability of the site for the development, (d) any submissions made in accordance with this Act or the regulations, (e) the public interest. The forthcoming EIS will consider and address all matters outlined in section 4.15(1) of the EP&A Act 1979. Section 4.46 – Integrated Development Section 4.46 of the EP&A Act 1979 defines ‘Integrated Development’ as matters which require consent from the consent authority and one or more authorities under related legislation. Pursuant to section 4.46(1), integrated development cannot be SSD.
<i>Environmental Planning & Assessment Regulation 2021</i>	The <i>Environmental Planning and Assessment Regulation 2021</i> (the EP&A Regulation) is relevant to the preparation and assessment of this SSDA in that it: • Outlines the form of development applications in section 24; • Sets out the form of an Environmental Impact Statement in section 190; • Identifies the ecologically sustainable development principles that must be considered in an SSDA in section 193; and • It classifies what development is considered designated development under section 7 and schedule 3. The forthcoming EIS will be prepared in accordance with the Regulation as relevant. All necessary requirements will be provided pursuant to sections 24 and 190 and the proposal will appropriately respond to the ecologically sustainable development principles established in section 193. The proposal, being for shop top housing, would not trigger designated development pursuant to schedule 3 of the Regulation.
Mandatory considerations – Environmental planning instruments	
<i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP)	Design Excellence Requirements for SSDs The design excellence requirements of the Planning Systems SEPP only apply to SSDs where: (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and



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Table 3. Statutory Context

Approval	Requirement
	<i>(b) the development is specified in Schedule 1 or 2.</i> The design excellence requirements do not apply to this proposal as the development of the land is permissible with consent under the CBLEP 2023 and the development is not specified in Schedule 1 or 2 of the Planning Systems SEPP.
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (RH SEPP)	Chapter 4 Remediation of land Chapter 4 of the RH SEPP outlines the controls relating to the remediation of land across NSW. Clause 4.6 states that the consent authority must not provide consent to development until it is satisfied that the land has been appropriately managed in terms of contamination. A Detailed Site Investigation Report and Remediation Action Plan have been prepared and the conclusions will be considered as part of the forthcoming EIS.
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (BC SEPP)	Chapter 2 Vegetation in non-rural areas Chapter 2 of the BC SEPP aims to protect the biodiversity value of trees and vegetation in non-rural areas of NSW. Chapter 2 requires consent for any vegetation or tree clearing that is not ancillary to development. Any proposed tree or vegetation removal will be ancillary to the proposed development and included as part of the SSDA. Therefore, this chapter is Not required to the proposal.
<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> (SB SEPP)	Chapter 2 Standards for residential development – BASIX Chapter 2 of the SB SEPP sets out the standards for BASIX development. Schedule 1 sets out the standards for the erection of a BASIX building. The proposal meets the definition of a BASIX building in accordance with the EP&A Regulation. A BASIX Certificate will be provided to support the forthcoming EIS.
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (TI SEPP)	Subdivision 2 Development in or adjacent to road corridors and road reservations Section 2.119 of the TI SEPP is not relevant to the proposed development as it will not be located on land with a frontage to a classified road. Section 2.122 sets out the requirements for traffic-generating developments, including the requirement for referral to Transport for NSW (TfNSW). Traffic-generating developments are defined in Schedule 3 of the TI SEPP, wherein the threshold for residential accommodation is defined as 75 or more dwellings on a site with access to a classified road or with access to a road that connects to a classified road (within 90m). The site has an accessway connecting to Hannans Road which connects to Broad Arrow Road situated approximately 80m south-east of the site. Therefore, the proposal will likely require referral to TfNSW.
<i>Canterbury-Bankstown Local Environmental Plan 2023</i> (CBLEP 2023)	Land Use Zoning The site is zoned E1 Local Centre pursuant to the CBLEP 2023. Shop top housing and commercial premises are permissible with consent in the E1 zone.



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Table 3. Statutory Context

Approval	Requirement
	Clause 4.3 Height of Buildings The site is subject to a height of building control of 27m. The application is seeking a concurrent rezoning of the site and will be supported by a proposal to revise the maximum height of building control to approximately 57m (subject to confirmation at lodgement). Clause 4.4 Floor Space Ratio The site is not subject to a floor space ratio control. Clause 5.10 Heritage Conservation The site is not identified as a heritage item nor within a heritage conservation area under the CBLEP 2023. However, it is in proximity to a local heritage item (ref. I219) referred to as the Inter war railway station buildings and pedestrian underpass. The site and heritage item are separated by Hannans Road reserve and buffered by street trees. A Statement of Heritage Impact is not considered necessary given the physical buffer, confirmation from DPHI is requested.
Mandatory considerations – Development control plans	
<i>Canterbury-Bankstown Development Control Plan 2023</i> (CBDPC 2023)	Section 2.10 of the Planning Systems SEPP exempts SDDs from requiring consideration of development control plans. Nevertheless, the CBDPC 2023 will be considered in the forthcoming EIS.

6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

We have undertaken a preliminary review of the industry-specific SEARs requirements for housing and identified the requirements we consider relevant to the project. We seek confirmation from DPHI on what requirements must be addressed.

Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
1. Statutory context • Address all relevant legislation, environmental planning instruments, plans, policies, guidelines and planning circulars; • Identify compliance with applicable development standards; • Provide a Clause 4.6 Variation Request for any non-compliances with applicable development standards (if required); • Summarise the detailed assessment of impacts and integrate findings and recommendations into the evaluation of the project as a whole; and	The statutory context will be wholly addressed within the EIS. The applicant will be pursuing a concurrent rezoning proposal. Evidence of agreement to the 5% affordable housing will be provided.



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Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
If affordable housing is being proposed, provide the name and ABN of the registered community housing provider that will be responsible for managing the affordable housing component, along with documentation confirming the provider's agreement to this responsibility	
2. Estimated Development Cost Provide the estimated development cost (EDC) prepared using the Standard Form of EDC Report.	An EDC Report will be provided.
3. Contributions and Public Benefit - Address the requirements of any relevant contributions plan(s), planning agreement or monetary contribution required. - Where a voluntary planning agreement is proposed, prepare a draft planning agreement in accordance with the Planning agreements – Practice note-February 2021.	The relevant contributions will be addressed within the EIS. A voluntary planning agreement is not relevant to the proposal.
4. Engagement Demonstrate that all required engagement and consultation activities have been undertaken in accordance with the <i>Undertaking Engagement Guidelines for State Significant Projects</i> including how it has been considered in the project design.	An Engagement Report will be provided.
5. Design Quality Demonstrate how the development will achieve design excellence in accordance with any applicable statutory provisions and good design in accordance with the objectives for good design in Better Placed.	A Design Excellence Strategy, Competition Report, and Design Review Report are not required for this proposal. An Urban Design Report will be prepared to address the objectives for good design in Better Placed.
6. Built Form and Urban Design - Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. - Provide an assessment of the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG). This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria. - If affordable housing is proposed, provide a floorplan outlining the gross floor area and dwellings that are provided as affordable housing.	The following documents will be provided: - Architectural Drawings; - Design Report; - Survey Plan; - Schedule of Colours; - Materials and Finishes; - Design Verification Statement; - Affordable housing floorplan.



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Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
7. Environmental Amenity - Assess amenity impacts on the surrounding locality, including solar access, visual privacy, view loss, view sharing, wind, lighting, and reflectivity. A high level of environmental amenity for any surrounding residential or sensitive land uses must be demonstrated. - Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during winter solstice) at hourly intervals between 9am and 3pm, comparing the proposed development, existing situation and where applicable, a development with no bonuses applied.	Shadow Diagrams will be provided. Chapter 4 of the Housing SEPP Assessment (ADG) will be addressed within the EIS.
8. Visual Impact - Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. - If the proposal would result in significant visual impact not anticipated by the planning controls, provide a visual impact assessment that addresses the visual impacts of the development on the existing catchment.	A Visual Impact Analysis will form part of the Urban Design Report in the form of photomontages and perspectives.
9. Transport - Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW. - If the construction of the development would cause interruptions to regular pedestrian and transport routes (including public transport, active transport or general traffic), a preliminary Construction Traffic (or Transport) Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.	A Transport Impact Assessment will be provided. General mitigation measures for traffic impacts during construction will be addressed within the EIS.
10. Noise and Vibration Provide a noise and vibration impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	A Noise and Vibration Impact Assessment will be provided.



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Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
11. Water Management - Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater). - Demonstrate how the development complies with council's drainage requirements and identify proposed stormwater treatment and water quality management measures to minimise adverse environmental impacts.	The development will be constructed on a site with existing drainage and servicing infrastructure incorporated. As such, an extensive Integrated Water Management Plan is not considered necessary. A Stormwater Management Plan will be provided.
12. Ground and Groundwater Conditions - Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site and including soil erosion. - Where required, provide a Groundwater Impact Assessment in accordance with relevant Groundwater Guidelines. If the proposed development is on land identified as having high salinity or acid sulfate soil potential in an EPI provide a Salinity Management Plan or Acid Sulfate Soil Management Plan that includes appropriate management measures and strategies.	A Geotechnical Assessment will be prepared. A Groundwater Impact Assessment is likely to be required due to the proposed dewatering associated with the basement construction.
13. Contamination and Remediation In accordance with Chapter 4 of the RH SEPP, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	A Detailed Site Investigation Report and Remediation Action Plan have been prepared for the site and will be provided as part of the EIS.
14. Trees and Landscaping - Provide a landscape plan detailing the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area) and demonstrating opportunities to retain significant trees have been explored and/or inform the plan. - If the proposal involves impacts to trees, provide an Arboricultural Impact assessment that assesses the number, location, condition and significance of trees to be removed and retained including tree root mapping and retained existing canopy coverage.	A Landscape Plan will be provided. If the final design confirms tree removal, an Arboricultural Impact Assessment will be provided.
15. Ecologically Sustainable Development (ESD) Identify how ESD principles are incorporated into the design and ongoing operation of development.	An ESD Report and BASIX Certificate will be provided.
16. Biodiversity	A BDAR Waiver will be lodged prior to submission of the EIS.



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Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020.	
17. Waste Management - Provide measures to be implemented in order to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements. - Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.	A Waste Management Plan will be provided.
18. Social Impact The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects.	Social impacts will be considered and addressed in EIS.
19. Flood Risk - Identify the flood planning area and level as set out in the relevant EPI and other supporting documents to determine; - The flood extent and velocity up to the Probable Maximum Flood and risk on-site having regard to adopted flood studies and, floodplain risk management studies and plans - The site access and egress routes - The potential effects of climate change, - Any relevant provisions of the NSW Flood Risk Management Manual, and any other relevant guidelines. - Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01. When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered; - Detail any flood risk management measures that are to be incorporated as part of the development having regard to relevant guidelines (including any design solutions, flood modification measures, property modification measures, operational procedures or Flood Emergency Response Plan).	A Flood Impact and Risk Assessment will be prepared.



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Table 4. SEARs Requirements

Issue and Assessment Requirements	Relevance to the project
20. Bushfire Risk This section applies to development on mapped bushfire prone land or where a bush/grass fire threat is identified on or adjoining the site.	A Bushfire Assessment is not considered necessary as the site is not bush fire prone land.
21. Aboriginal Cultural Heritage - Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by providing an initial assessment of potential impacts. - If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site and is prepared in accordance with relevant guidelines.	Per the advice provided in Attachment 2 , an Aboriginal Cultural Heritage Assessment Report is not considered necessary.
22. Environmental Heritage Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	The site is not identified as a heritage item nor within a heritage conservation area under the CBLEP 2023. However, it is in proximity to a local heritage item (ref. I219) referred to as the Inter war railway station buildings and pedestrian underpass. The site and heritage item are separated by Hannans Road reserve and buffered by street trees. A Statement of Heritage Impact is not considered necessary given the physical buffer, confirmation from DPHI is requested. An Archaeological Assessment is not considered necessary as the site is not identified as having archeological significance.
23. Public Space This section applies to developments that propose public space.	A Public Space Plan will not be required as the development does not offer public space.
24. Hazards and Risks This section applies to development affected by above ground dangerous goods storages from surrounding developments or underground high-pressure dangerous goods pipelines within the project vicinity.	A Hazard Analysis will not be required as no dangerous goods will be stored, and the site is not in the vicinity of underground high-pressure dangerous goods pipelines.



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7 CONCLUSION

This letter has been prepared on behalf of the proponent and provides a description of the subject site and the proposed development of shop top housing at 116 Penshurst Street, Narwee.

It is considered that this letter provides sufficient information to enable the industry-specific SEARs for the project to be issued. However, should you require any further information please do not hesitate to contact me at any time on 0415 598 373 or via email at nryan@patchplanning.com.au.

Yours sincerely,

Naomi Ryan
ASSOCIATE DIRECTOR