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SYDNEY NSW 2000**

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18 March 2025

Keith Ng, Team Leader
Housing & Key Sites Assessment – Social & Affordable Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Keith,

REQUEST FOR INDUSTRY-SPECIFIC SEARS | 84 TALLAWONG ROAD, ROUSE HILL

1. INTRODUCTION

This letter has been prepared on behalf of LK Property Group (**the Proponent**) to provide a detailed description of the proposed State Significant Development Application (**SSDA**) for residential development (including in-fill affordable housing) at 84 Tallawong Road, Rouse Hill (**the site**).

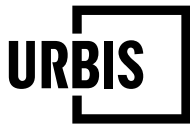
This request seeks the industry-specific Secretary's Environmental Assessment Requirements (**SEARs**) for in-fill affordable housing, to enable the preparation of an Environmental Impact Statement (**EIS**) that will accompany the proposed SSDA.

The site is located within the Blacktown Local Government Area (**LGA**) and is zoned R3 Medium Density Residential under Appendix 11 (Blacktown Growth Centres Precinct Plan) of *State Environmental Planning Policy (Precincts—Central River City) 2021 (Central River City SEPP)*. Development for the purpose of residential flat buildings is permissible with consent within the R3 Medium Density Residential zone under the provisions of the Central River City SEPP.

The proposal satisfies the definition of State Significant Development (**SSD**) pursuant to Schedule 1, Section 26A of the *State Environmental Planning Policy (Planning Systems SEPP) (Planning Systems SEPP)* as it is development to which *State Environmental Planning Policy (Housing) 2021*, Chapter 2, Part 2, Division 1 applies that:

- Is not prohibited under an environmental planning instrument applying to the land.
- Has a residential component that exceeds \$75 million.
- Meets the locational requirements of the Housing SEPP;
- Will provide at least 10% of the residential component as affordable housing for at least 15 years, and

This Request for SEARs letter provides a brief overview of the proposed development and the relevant planning framework to enable the issuance of the SEARs, which will guide the preparation of a formal EIS for the future development of the site under the SSDA pathway.



The following sections of this letter identify the applicant for the project, provide the background to this development, and describe the site and proposed development to enable the issuance of SEARs.

2. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 – Applicant Details

Descriptor	Proponent Details
Full Name	LK Property Group Holdings PTY LTD
Postal Address	Level 10, 10 Queens Road Melbourne VIC 3004 Australia
ABN	90 398 314 970
Nominated Contact	Shannon Roberts E: shannon.roberts@lkg.com.au P: 0419 323 440 Taylah Brito E: tbrito@urbis.com.au P: +61 2 8424 5101

3. BACKGROUND

3.1. EXISTING APPROVALS

At present, the site benefits from three (3) approved local Development Applications (**DAs**) for subdivision, demolition and construction of 2 x shop top housing buildings and 4 x residential flat buildings (all 4 storeys in height) with associated car parking, stormwater drainage and landscaping (refer to descriptions in table below).

Table 2 – Existing approvals

DA ref.	Description	Approval particulars
SPP-17-00031	Demolition of an existing dwelling and outbuildings, Torrens title subdivision to create 3 super lots and 1 road lot for the construction of roads, 2 residential flat buildings containing a total of 119 units and 8 commercial tenancies with 127 residential car parking space, 24 commercial car parking spaces and 24 visitor parking spaces over 2 basement levels on proposed Lot 1 and associated stormwater drainage works and landscaping.	Approved by the Sydney Central Planning Panel on 8 January 2019.
SPP-17-00032	Construction of 2 x 4 storey residential flat buildings containing a total of 123 units and 155 car parking spaces over 2 basement levels and associated	Approved by the Sydney Central Planning Panel on 12 November 2019.

DA ref.	Description	Approval particulars
	stormwater drainage works and landscaping on proposed Lot 2 to be created under SPP-17-00031.	
SPP-17-00033	Construction of 2 x 4 storey residential flat buildings containing a total of 127 units and 160 parking spaces over 2 basement levels and associated stormwater drainage works and landscaping on proposed Lot 3 to be created under SPP-17-00031.	Approved by the Sydney Central Planning Panel on 31 January 2019.

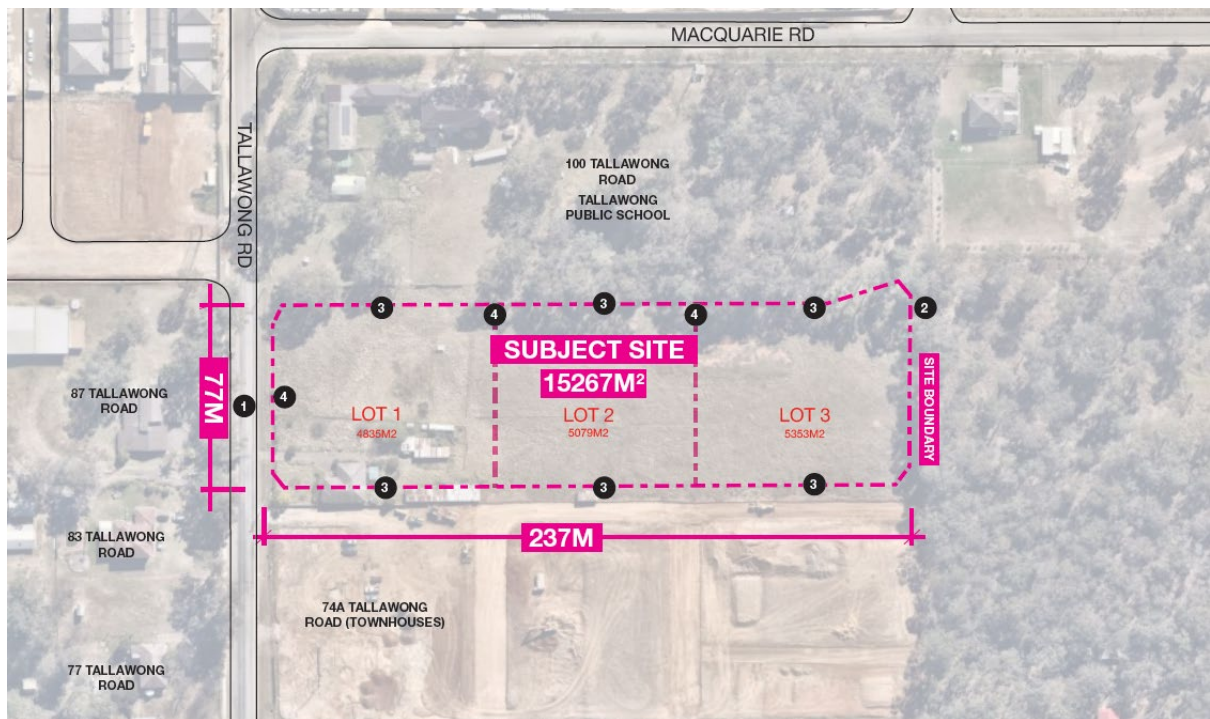
These approved DAs have been subject to several modifications since their approval (which have been sought to satisfy deferred commencement conditions), however none of these modifications have materially altered the approved land use, built form, development yield, or environmental outcomes of the intended development. Copies of the existing consents have been provided as part of this SEARs Request.

It is important to note that all 3 existing consents expire on 3 September 2025.

3.2. THE APPROVED SCHEME

Figure 1, below, shows the approved subdivision layout. Figure 2 shows a perspective image of the approved development.

Figure 1 – Approved subdivision plan



Source: Rothe Lowman, February 2024

Figure 2 – Perspective of approved development



Source: Archidrome, 2017

4. SITE DESCRIPTION

The site is on Dharug land. It is located at 84 Tallawong Road, Rouse Hill and is legally described as Lot 63 in Deposited Plan 30186. The location of the site is illustrated in **Figure 3**, below.

Figure 3 – The subject site



Source: Urbis, 2024

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below. Photographs of the site and locality are provided below.

Table 3 – Key Features of Site and Locality

Descriptor	84 Tallawong Road, Rouse Hill
Land Configuration	<p>The site comprises a single allotment of 15,267m². The land is 82.105m wide and has a length of 246.47m.</p> <p>The site has a consistent fall from the south-eastern corner to the north-western corner of approximately 12.5m.</p>
Land Ownership	<p>The site is owned by LK Property Group.</p>
Existing Development	<p>The site currently accommodates a single-storey, private residential dwelling on the south-west corner. Various large rural outbuildings are situated to the rear of the dwelling.</p> <p>A large dam is situated along the northern boundary of the site, which will be decommissioned.</p>

Descriptor	84 Tallawong Road, Rouse Hill
Local Context	<p>The immediate context of the site is described below:</p> <p>North: The northern boundary of the site adjoins 100 Tallawong Road / 24 Macquarie Road, the site of the future Tallawong Public School.</p> <p>South: The south of the site adjoins 74-74A Tallawong Road, which is subject to a recent development consent (DA-21-01954) for 36 2-storey dwellings across various new Torrens title and community title allotments.</p> <p>East: East of the site is 95 Cudgegong Road and 105 Cudgegong Road (2 individual properties). 95 Cudgegong Road is subject to development consent SP-17-00041 which entails the construction of 2x 4-storey residential flat buildings comprising 208 apartments. 105 Cudgegong Road contains a private residential dwelling which is not subject to any recent development consents.</p> <p>West: The western boundary of the site fronts onto Tallawong Road, a 2-lane, 2-way local road.</p>
Regional Context	<p>The site is located within the new suburb of Tallawong, which forms part of the Riverstone East precinct (Stage 1). Stages 1 & 2 of the Precinct, which have already been subject to planning control amendments, will provide up to 3,500 new homes, a new primary school (which directly adjoins the subject site to the north) and a new community facility. The entire Riverstone East precinct, following the rezoning of Stage 3, will deliver up to 5,800 new homes.</p> <p>Tallawong will house a new town centre, to the north of the Metro, which will provide local-order services and jobs.</p> <p>At present, the locality has seen the delivery of a number of new low- and medium-density residential developments to the north and east of the subject site, which benefit from upgraded roads and proximity to Tallawong Metro Station. The site's immediate vicinity – being the block bound by Tallawong Road to the west, Cudgegong Road to the east, Macquarie Road to the north, and Implexa Avenue / Tallawong Metro Station to the south, remains largely undeveloped. The new town centre, immediately north of the Metro station, is however under construction.</p>
Infrastructure	<p>The area is serviced by Tallawong Metro Station, located approximately 760m south of the subject site (refer to discussion at Section 7.2 below). Tallawong is also serviced by public bus services connecting to the key centres of Rouse Hill and Marsden Park.</p>
Site Access	<p>Vehicle and pedestrian access to the site is via Tallawong Road. The existing development consent provides new internal roads to access basement car and bike parking.</p>
Services	<p>Infrastructure upgrades are currently being delivered across the area including road and footpath upgrades, traffic signals, water connection points, and electricity boxes / Telstra pits.</p>
Acid Sulfate Soils	<p>The site is not affected by acid sulfate soils.</p>

Descriptor	84 Tallawong Road, Rouse Hill
Contamination	A Stage 1 Preliminary Site Investigation prepared for the original DA consent has found that the underlying soils at the site are not contaminated.
Stormwater and Flooding	The site is not flood affected.
Bushfire Prone Land	The site is not identified as being bushfire prone and is not affected by bushfire-related development controls.
Flora and Fauna	Although there are a number of trees currently on the site, the land is not located within a riparian corridor or within any protected environmental area. Approximately 100m the south of the site is a portion of land zoned C2 Environmental Conservation, known as Cudgegong Reserve.
Aboriginal Heritage	The site is not known to contain and is not likely to be in the vicinity of, any Aboriginal heritage items. The site is not identified as being a registered Aboriginal archaeology site.
European Heritage	The site is not identified affected by European heritage overlays, nor is it in the vicinity of any European heritage items.

Images of the site and the locality, taken by Urbis during a site inspection carried out on 24 May 2024, are provided below.

Figure 4 – Facing north along Tallawong Road, with subject site on right of frame



Figure 5 – Facing south along Tallawong Road, with subject site on left of frame



Figure 6 – Facing south at Macquarie Road, to the east of the site of the future Tallawong Public School



Figure 7 – Cudgegong Reserve, to the south of the subject site.

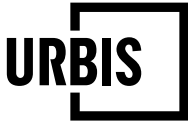


Figure 8 – Facing north along Cudgegong Road, near the intersection with Grassland Street.



Figure 9 – Tallawong Metro Station (centre of frame) and new mixed-use development to the south.





5. DEVELOPMENT DESCRIPTION

5.1. PROJECT PATHWAY

The Scoping Request is submitted pursuant to the August 2024 amendments to the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP). The application will be submitted pursuant to Schedule 1, Section 26A (1)(a)(i) of the Planning Systems SEPP.

The proposal satisfies the requirements under Schedule 1, Section 26A of the Planning Systems SEPP as it is development to which State Environmental Planning Policy (Housing) 2021, Chapter 2, Part 2, Division 1 applies as follows:

- It is permissible with consent under Central River City SEPP.
- Proposes an affordable housing component greater than 10%.
- Is located in an accessible area.
- The estimated development cost, including the existing approved residential development exceeds \$75 million.

An Estimated Development Cost (EDC) Report has been prepared to confirm the EDC of the residential component of the development is greater than \$75 million which triggers SSD under the Planning Systems SEPP.

Given all three consents expire on 3rd September 2025, it is requested that SEARs be issued as early as possible by the Department in order for the proposal to leverage the SSDA pathway which is proposed under the Planning Systems SEPP. Arrangements are currently being made to ensure that 'physical commencement' is achieved before 3 September, to ensure that the existing consents do not lapse and can continue to be updated as part of the SSDA. It is in turn envisaged that the existing consents have the potential to be updated through a condition of consent, and the associated serving of a notice under Clause 67 of the Regulations/Section 4.17(5) of the Act.

As a relevant consideration for the Department, it is confirmed that the approved development is not subject to any local- or State-level planning agreements.

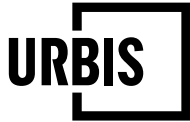
More broadly, it can be confirmed that the project is 'shovel-ready', and the Proponent intends on commencing works as soon as possible in order to deliver much-needed additional market-rate and affordable housing within this key growth area, supported by a high level of accessibility.

5.2. DESCRIPTION OF DEVELOPMENT

The key components of the proposed development are listed in the following table. A copy of the architectural concept drawings is submitted with the request for SEARs.

Table 4 – Project Details

Descriptor	Project Details
Project Area	The site has a total area of 15,267m ² .
Project Description	The SSDA will seek consent for the construction of 6x residential flat buildings on the site, comprising 434 units (including 72 affordable units), 152 car parking spaces, and associated landscaping and installation of associated services (including stormwater, electrical, mechanical, etc.).



Descriptor	Project Details
	<p>The proposed development include:</p> <ul style="list-style-type: none"> ▪ Additional building height in response to the infill affordable housing uplift. ▪ Internal layout changes to improve amenity and functionality. ▪ Modified façade composition to align with DCP. ▪ Internal building separation to align with amended layout and façade composition changes. ▪ Altered communal open space to increase diversity of offerings. ▪ Updating the basement floor plans to achieve relevant parking compliance.
Subdivision	The SSDA will not seek to alter the existing, approved subdivision. The existing consent will be utilised to facilitate subdivision.
Building Height	Maximum building height of 15.6m, equivalent to 5.5 storeys.
Gross Floor Area and Floor Space Ratio	<p>The development will achieve a total Gross Floor Area of 35,520m² of residential floor space.</p> <p>This represents a Floor Space Ratio of 2.33:1.</p>
Dwelling Yield	<p>434 dwellings are proposed to be delivered by this development.</p> <p>72 (17%) of these units will comprise affordable housing as defined under Chapter 2 of the Housing SEPP.</p>
Parking	<p>The development will achieve 152 car parking spaces and 62 bicycle parking spaces.</p> <p>Access to basement carparking will be from internal shared ways within the site, accessed at the north and south boundaries.</p>
Communal Open Space	<p>Common open space will be provided around the 6 residential buildings on the site, including landscape buffering to the property boundaries.</p> <p>Provision has also been made for additional common open space on rooftops, subject to further design development.</p>
Estimated Development Cost	\$249,180,000 (excluding GST).

Figure 10 – 3D view of proposed SSDA scheme



Source: Rothelowman, February 2024

5.3. PROPOSED DEVELOPMENT

Since approval of the original DAs, the market has substantially changed and the new in-fill affordable housing policy amendments have come into effect under the *State Environmental Planning Policy (Housing) 2021 (the Housing SEPP)*.

In light of this current policy context and the urgent need for additional housing supply in key growth areas, the Proponent seeks to lodge a new SSD application to provide a substantial quantum of affordable housing as part of the residential development, and in so doing leverage the related height and floor space bonuses to provide a 30%+ increase to the approved dwelling yield.

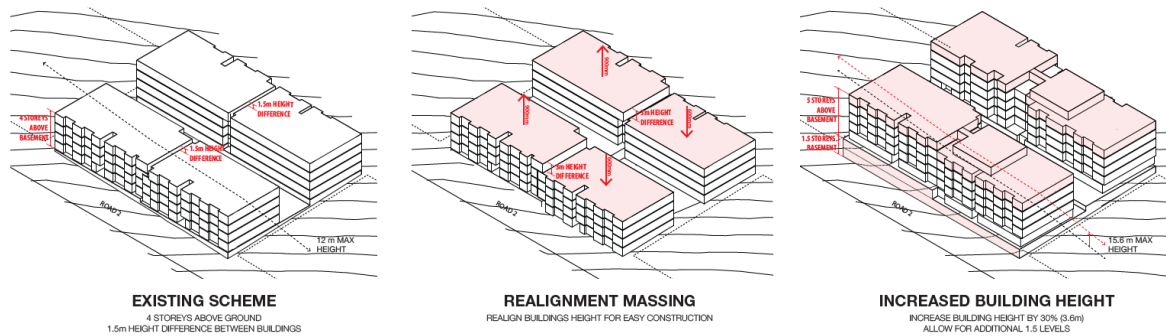
The proponent is seeking to alter the approved development (as modified) to incorporate:

1. Additional building height
 - (a) Each of the six approved building forms have extra height to cater for the infill affordable housing uplift
 - (b) Due to the slope of the site, this creates 5/6 storey building heights
2. Internal Layout improvements
 - (a) Improvement of internal amenity to each of the existing building internal layouts
 - (i) Optimise solar access
 - (ii) Improve dwelling amenity
 - (b) Integration of internal spatial planning requirements of the latest version of the National Construction code

- (i) Increased floor to floor heights.
 - (ii) Bathroom area dimensional requirements and clearances
3. Updated façade composition to align with development plans
 - (a) Maintain DCP street setbacks
 - (b) Façade updated to comply with latest NCC and Environmental performance standards
 4. Internal building separation
 - (a) Minor adjustments to internal building separation to suit updated layout and façade composition
 5. Altered communal open space
 - (a) Greater diversity in roof top spaces, with split level design integrated
 6. Update Basement floor plans
 - (a) Internal changes to arrange parking to comply with latest Australian Standard for parking spaces, and DDA spaces

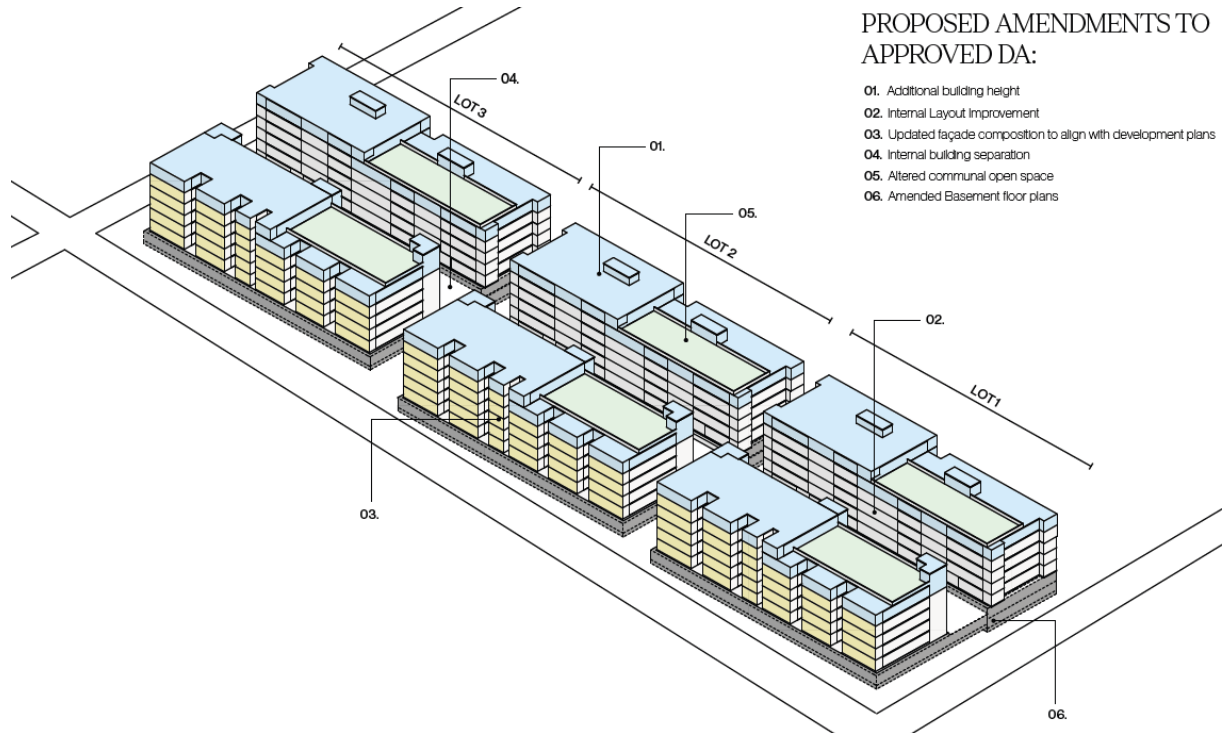
The below massing diagrams show the difference between the approved development (without the provision of affordable housing) and the proposed SSDA (inclusive of the affordable housing building height bonus). A diagram at Figure 12 visually demonstrates where these changes are proposed.

Figure 11 – Indicative massing of approved development (left) and proposed SSDA (right)



Source: Rothelowman, February 2024

Figure 12 Proposed Updates to Approved DA



Source: Rothe Lowman February 2025

6. STRATEGIC CONTEXT

The proposed development is considered to be well aligned with the applicable strategic planning framework, including:

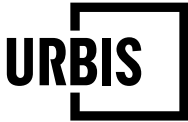
Greater Sydney Region Plan: A Metropolis of Three Cities

- Objective 4 – Infrastructure use is optimised
- Objective 5 – Benefits of growth realised by collaboration of governments, community and business
- Objective 10 – Greater housing supply
- Objective 11 – Housing is more diverse and affordable
- Objective 14 – A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities

Central City District Plan

- Planning Priority N1 – Planning for a city supported by infrastructure
- Planning Priority N5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport

Blacktown Local Strategic Planning Statement 2020



- Strategic Direction 1 – A vibrant and inclusive community
- Strategic Direction 4 – A growing city supported by accessible infrastructure

Blacktown Housing Strategy 2020

- Priority 1 – Plan for housing supply to meet population growth
- Priority 2 – Plan for housing supported by infrastructure
- Priority 3 – Plan for appropriate housing in suitable locations
- Priority 4 – Plan for diversity and choice in housing
- Priority 5 – Plan to improve housing affordability
- Priority 6 – Promote excellence in housing design
- Priority 7 – Improve housing resilience and sustainability

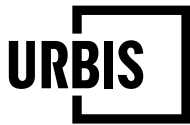
The EIS accompanying the future SSDA will address in detail how the proposed development is consistent with the relevant strategic planning framework.

7. STATUTORY CONTEXT

A preliminary assessment is provided below against the relevant mandatory considerations within applicable State Environmental Planning Policies.

Table 5 – Mandatory Considerations

Requirement	Relevance
Power to grant approval	Section 26A of Schedule 1 of the Planning Systems SEPP sets out that development which has an estimated development cost of more than \$75 million is SSD. Estimated cost of development – \$249,180,000 (excluding GST).
Permissibility	The proposed development, for the purpose of residential flat buildings, is permitted with consent on the land, which is zoned R3 Medium Density Residential.
Mandatory matters for consideration	<ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Housing) 2021</i> ▪ <i>State Environmental Planning Policy (Planning Systems) 2021</i> ▪ <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> ▪ <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> ▪ <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>
<i>State Environmental Planning Policy (Housing) 2021,</i>	
Chapter 2 Affordable Housing, Division 1 In-fill affordable housing	
15C Development to which division applies	Development for the purpose of residential flat buildings is permitted with consent on the land under the provisions of the relevant EPI for the site (being, the Central River City SEPP). The affordable housing component will comprise approximately 17% of the total dwelling yield.



Requirement	Relevance
	The site is located within the Six Cities Region and is an “accessible site” under the definition within the Housing SEPP. Refer to discussion at Section 7.2, below.
18 Affordable housing requirements for additional building height	<p>The development entails the construction of residential flat buildings and does not seek to use the additional floor space ratio permitted under Section 16 of the Housing SEPP.</p> <p>The affordable housing component of the development will comprise approximately 17% of the total dwelling yield. This exceeds the minimum requirements set out by Section 18, as follows:</p> <ul style="list-style-type: none"> ▪ The proposal seeks additional building height of 26% ▪ The minimum affordable housing to be provided is 13% ▪ The proposal will deliver 17% affordable housing
20 Design Requirements	The proposed design of the residential development has considered the character of the local area. A design statement will be prepared as part of the SSDA.
21 Must be used for affordable housing for at least 15 years	The Proponent is committed to the delivery of this project and the significant investment in affordable housing which will be made. Once appointment by the Proponent, details of a registered Community Housing Provider for this development will be included as part of the SSDA.
Chapter 4 Design of residential apartment development	
147 Determination of development applications and modification applications for residential apartment development	As the detailed design progresses, the proposed development will ensure it considers the relevant provisions from Chapter 4 of the Housing SEPP including the Apartment Design Guide (ADG) and any advice from a design review panel (if determined by the consent authority to be applicable).
State Environmental Planning Policy (Resilience and Hazards) 2021	
Chapter 4 Remediation of land	
4.6 Contamination and remediation to be considered in determining development application	<p>Section 4.6 of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> requires a consent authority to consider whether land is contaminated prior to the granting of development consent.</p> <p>The Stage 1 Preliminary Site Investigation submitted with the earlier DA has identified that the land does not contain any known contamination and that it is suitable for residential development.</p> <p>Since approval of the earlier DA, the land use has not changed and it is therefore not considered that the land would now be contaminated.</p> <p>For completeness, the SSDA will be supported by appropriate level of contamination investigations.</p>

Requirement	Relevance
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	
Chapter 2 Infrastructure	
2.122 Traffic-generating development	<p>The SSDA will deliver in excess of 300 new dwellings on a site with access to a road and is therefore defined as traffic-generating development in accordance with <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>.</p> <p>The SSDA will be supported by a Traffic Report which will assess impacts on the local road network as a result of this development.</p>

7.1. SITE ACCESSIBILITY – HOUSING SEPP, SECTION 15C(C)

7.1.1. Definitions

Section 15C(1)(c)(i) of the Housing SEPP sets a requirement that development for the purpose of in-fill affordable housing can only be carried out:

“if [...] all or part of the development is carried out—for development in the Six Cities Region, [...] in an accessible area”

The Dictionary contained at Schedule 10 of the Housing SEPP defines “accessible area” as follows:

accessible area means land within—

(a) 800m walking distance of—

- (i) a public entrance to a railway, metro or light rail station, or
- (ii) for a light rail station with no entrance—a platform of the light rail station, or
- (iii) a public entrance to a wharf from which a Sydney Ferries ferry service operates, or

(b) (Repealed)

(c) 400m walking distance of a bus stop used by a regular bus service, within the meaning of the Passenger Transport Act 1990, that has at least 1 bus per hour servicing the bus stop between—

- (i) 6am and 9pm each day from Monday to Friday, both days inclusive, and
- (ii) 8am and 6pm on each Saturday and Sunday.

The Housing SEPP Dictionary also provides the following definition of “walking distance”:

walking distance means the shortest distance between 2 points measured along a route that may be safely walked by a pedestrian using, as far as reasonably practicable, public footpaths and pedestrian crossings.

7.1.2. Bus stops

The site benefits from proximity to the following bus stops, which are serviced by the 742 bus route operating between Rouse Hill Station and Marsden Park:

Table 6 – Bus stops within 400m walking distance of the site

Bus stop	Stop ID	Location from 84 Tallawong Road (walking distance, approx.)	Ref.
Tallawong Rd before Terrara St	2155476	170m to the north	1
Tallawong Rd opp 72	2155475	150m to the south	2

Figure 13 – Subject site (red outline) and proximate bus stops

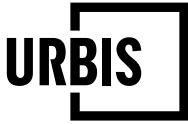


Source: Google Maps, 2024, with Urbis overlay

The timetable for the 742 bus route was updated on 14 October 2024. This new timetable (attached to this letter), indicates that the 742 route now operates at least:

- Once per hour between 6am and 9pm from Monday to Friday, both days inclusive, and
- Once per hour between 8am and 6pm on both Saturday and Sunday

For completeness and avoidance of doubt, we note that on the attached timetable, that the abovementioned bus stops in the site’s proximity are not identified. However, Urbis has now directly confirmed with Transport for NSW that these stops are “signal driver stops”. This means that the bus will stop when flagged down by a waiting passenger or by a passenger on board wishing to alight. We



note that the definition of “accessible site” does not preclude this situation from constituting a bus stop, for the purposes of the definition.

Accordingly, the site is considered “accessible” under part (c) of the definition provided in the Housing SEPP.

7.1.3. Proximity to Tallawong Metro station

GIS analysis has found that the site is located within 800m direct distance of the northern public entrance to Tallawong Metro Station.¹ Based on the anticipated delivery of the movement network within and north of the Tallawong Town Centre – as indicated on the finalised Indicative Layout Plan prepared by the then-Department of Planning, Industry and Environment – the southern end of the site will be within 800m walking distance of the northern public entry to Tallawong Metro Station. **Figure 12**, below, shows these distances.

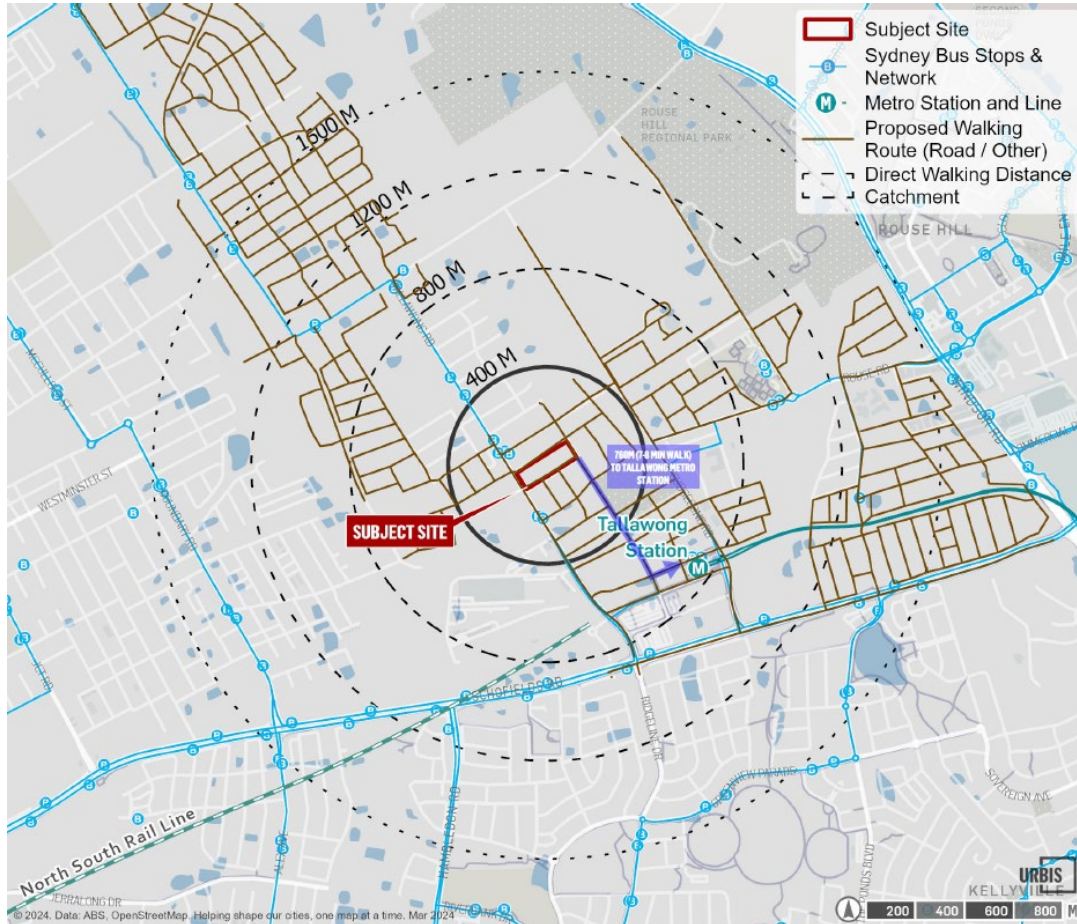
Based on Urbis’ inspection of the site and surrounding area carried out in May 2024, it is evident that this movement network is being progressively delivered in conjunction with the delivery of new medium-density housing throughout the Tallawong Town Centre, as required by the suite of strategic and statutory planning policies set out for the area by the Department.

Legal advice on this matter has been sought by the Proponent, and has been provided separately to the Department. Relevantly, it finds that:

Having regard to the policy basis for the Six Cities Regions, it would seem reasonable to approach the meaning of “accessible area” as meaning the land the subject of the proposal must be 800m walking distance from (in this case), a metro station, not immediately, with within a timeframe of delivery of the development (or the relevant transport infrastructure), and where the delivery of either / both the proposal and the transport infrastructure is certain. There must a be point in time when the land will become accessible with enough certainty that the consent authority can be confident that the proposal when concluded, will be within 800m of the transport infrastructure.

¹ While there are several bus stops directly outside the subject site, the buses do not meet the servicing requirements under the Housing SEPP Dictionary.

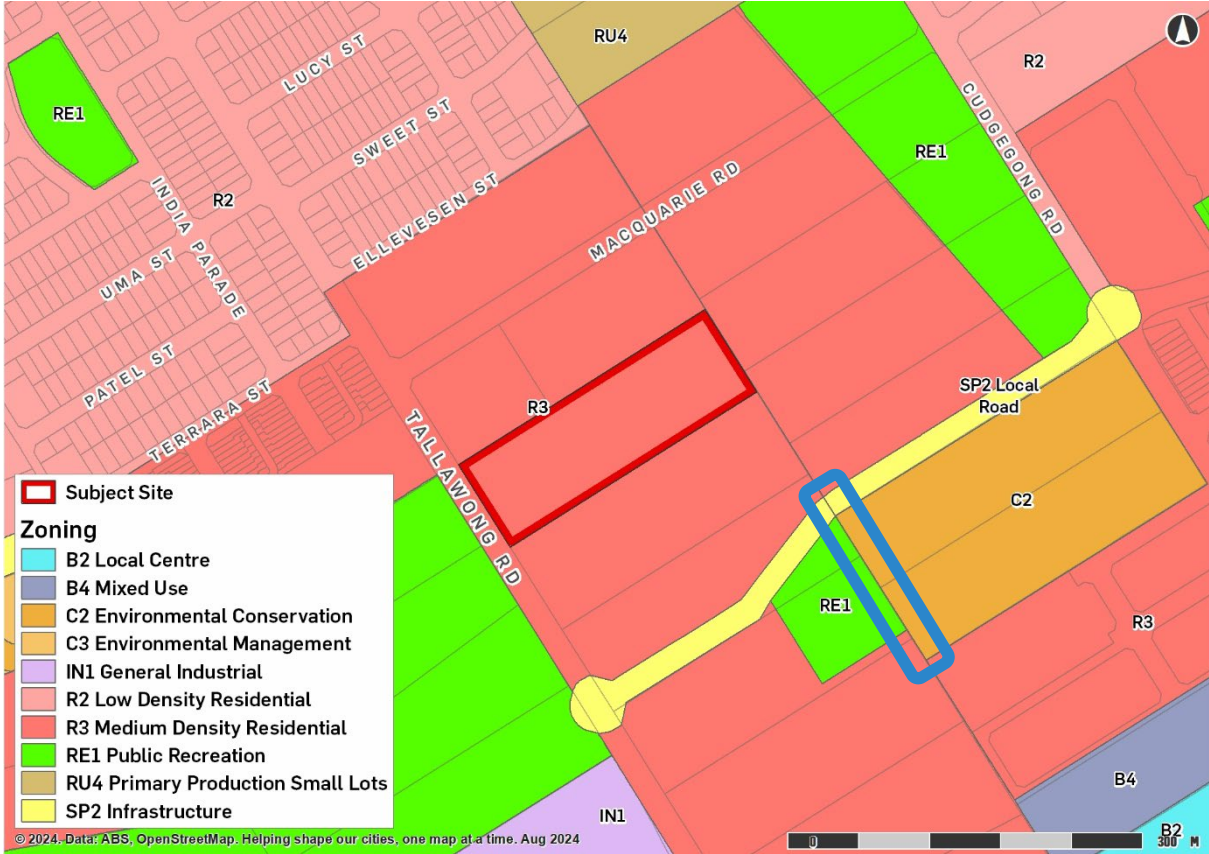
Figure 14 – Site accessibility map



Source: Urbis, 2024

For completeness, it is noted that the Cudgegong Reserve, south of the site, will remain C2 Environmental Conservation land and will not undergo redevelopment consistent with the rest of the precinct. However, directly west of this land is a portion of what is currently privately-owned land which is zoned RE1 Public Recreation. Both of these allotments will be accessed via a new road, which is reserved as an SP2 Local Road on the current land zoning map. While it is not yet known what kind of movement path will be delivered at this particular interface, given the public nature of these areas it is reasonable to expect that this area will remain open for public use at all times, without any encumbrance.

Figure 15 – Zoning map, showing interface of RE1 and C2 land (outlined blue) in relation to 84 Tallawong Road (outlined red)



Source: NSW Planning Portal Spatial Viewer, 2024, with Urbis overlay

Accordingly, we therefore consider that the site meets an additional accessibility requirement under point (a) of the definition as provided in the Housing SEPP.

7.2. CENTRAL RIVER CITY SEPP COMPLIANCE

A preliminary assessment of the proposal as currently documented against the relevant development standards and provisions of Appendix 11 of the Central River City SEPP is provided below.

Table 7 – Central River City SEPP, Preliminary Compliance Assessment

Clause	Provision	Comment
2.3 Zone objectives and Land Use Table	The land is zoned R3 Medium Density Residential.	The SSDA proposes to develop 6 residential flat buildings on the land. Residential flat buildings are permitted with consent on R3 land.
4.1B Residential density	The land is identified as T1, which requires a minimum of 25 dwellings per hectare.	This clause applies to land on which subdivision is proposed. Although no subdivision is proposed under the SSDA (as the existing subdivision consent will be used),

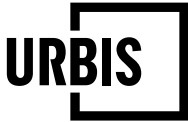
Clause	Provision	Comment
		the development will achieve the minimum density standards required by this clause. Each of the 3 lots on the site is less than 1 hectare in size, and the development will achieve an average of 144 dwellings on each of these lots.
4.3 Height of buildings	Maximum building height of 12m.	As outlined, in Section 5.2 above, the proposal seeks to utilise the incentivised 30% uplift height controls permitted under Chapter 2 of the Housing SEPP, to achieve a maximum building height of 15.6m. This will result in a breach of the maximum height limit as prescribed by the Central River City SEPP, however will remain consistent with the 30% additional building height afforded by the Housing SEPP.
4.4 Floor space ratio	No FSR standard applies to the site.	N/A.
5.9 Preservation of trees	A permit or development consent must be granted for any works which would involve ringbarking, cutting down, topping, lopping, or removing trees.	The SSDA will entail the removal of all existing trees on the site. Development consent will, accordingly, be sought as part of the future SSDA for these works. It is noted that the future development will include new landscaping which will ensure the protection of canopy coverage in the locality.
6.1 Public utility infrastructure	The consent authority must be satisfied that any public utility infrastructure that is essential for the proposed development is available, or that adequate arrangements have been made to make that infrastructure available when it is required.	The existing development consent has demonstrated that adequate provision can and will be made for necessary public utility infrastructure. The future SSDA will, equally, demonstrate that this will be feasible for the purposes of this development.

8. ENGAGEMENT

8.1. ENGAGEMENT TO DATE

The Proponent has met / corresponded with the following relevant agencies in the course of preparing this Request for SEARs:

- Pre-scoping meeting with Department of Planning, Housing and Industry on 10 April 2024
 - Follow-up correspondence following that meeting, including provision of a legal opinion regarding site accessibility requirements
- Meeting with Schools Infrastructure NSW on 20 June 2024



- Email correspondence with Transport for NSW on 27 May 2024
- Pre-application meeting with Blacktown City Council on 1 August 2024
- Formal scoping meeting with Department of Planning, Housing and Industry on 8 December 2024

8.2. ONGOING / FUTURE ENGAGEMENT

In accordance with the Industry-Specific SEARs for In-fill Affordable Housing, the Proponent will carry out future engagement with relevant stakeholders (including the abovementioned agencies, any other relevant agencies, and the community) and provide details of this engagement with the Environmental Impact Statement accompanying the SSDA. The engagement will be consistent with the Department's *Undertaking Engagement Guidelines for State Significant Projects*.

9. OVERVIEW

We trust the information provided with this letter provides sufficient details to provide the Department with a comprehensive understanding of the proposed development to facilitate the issue of Industry-Specific SEARs for this proposed In-fill Affordable Housing development.

If you require any further information, please do not hesitate to contact me to discuss. Similarly, we would be happy to arrange a suitable time to meet should it be useful to see matters advanced.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "swilkes".

Simon Wilkes
Director
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