



beam

State Significant Development Application Environmental Impact Statement

Residential Development
2 and 2A Bullecourt Avenue, Milperra

Prepared for Mirvac Residential (NSW) Developments Pty Ltd

17.11.25
25130

Beam Planning acknowledge that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia. We pay respect to Elders past and present and commit to respecting the lands we walk on, and the communities we work with.

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EIS Declaration

Project Details	
Project name	2 & 2A Bullecourt Avenue, Milperra HDA
Application number	SSD-97092958
Address of the land in respect of which the development application is made	2 and 2A Bullecourt Avenue, Milperra (Lot 2 in DP1291984 and Lot 1 in DP101147)
Applicant Details	
Applicant name	Mirvac Residential (NSW) Developments Pty Ltd
Applicant address	Level 28, 200 George Street Sydney NSW 2000 Australia
ABN	29 609 513 135
Details of person by whom this EIS was prepared	
Name	Ashleigh Ryan
Organisation	Beam Planning Pty Ltd
Address	Suite 7.01, Level 7, 60 Carrington Street, Sydney NSW 2000
Professional qualifications	BPlan (Hons 1), UNSW & RPIA REAP
Declaration by registered environmental assessment practitioner	
Name	Ashleigh Ryan
Registration number	59156
Organisation registered with	Planning Institute of Australia
Declaration	The undersigned declares that this EIS: • Has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • Does not contain information that is false or misleading; • Addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • Identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • Has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • Contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • Contains a consolidated description of the project in a single chapter of the EIS; • Contains an accurate summary of the findings of any community engagement; and • Contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	17 November 2025

Executive Summary

Where is the site?

The site is located at 2 and 2A Bullecourt Avenue Milperra (Lot 2 in DP1291984 and Lot 1 in DP101147), in the Canterbury Bankstown Local Government Area (LGA).



 THE SITE

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What is this SSDA for?

This is a State Significant Development Application (SSDA) prepared on behalf of Mirvac Residential (NSW) Developments Pty Ltd for a residential development which seeks consent for the creation of residential lots, remaining superlots, and includes the construction of 62 houses, three new public parks, new roads through the site, car parking to service the existing child care centre, and other ancillary works such as drainage and civil works.

Why is it being lodged?

Canterbury Bankstown has been allocated 14,500 dwellings to be completed by 2029 under the National Housing Accord. To support this, in early 2025, the Housing Delivery Authority was established which provides an opportunity for certain residential developments to be nominated for a State Significant Development Assessment pathway. The proposal was recommended to be declared as State Significant Development due to its consistency with the HDA criteria and the Minister for Planning and Public Spaces subsequently issued State Significant Development Declaration Order 2025 (No 13) formalising the recommendation. The proposed development creates the opportunity for up to 430 dwellings to be delivered across the currently unused site alongside significant open space and other supporting development which will benefit future and existing surrounding residents.

What is the development's strategic context?

In July 2020, a planning proposal (PP-2021-5837) was submitted to the Council for the rezoning of the land to facilitate the comprehensive redevelopment of the site for primarily low-rise residential accommodation. In June 2024, the rezoning was finalised and the *Canterbury-Bankstown Local Environmental Plan 2023* (CBLEP 2023) was amended in accordance with the planning proposal, including rezoning the land to R1 General Residential, RE1 Public Recreation, B1 Local Centre, and C2 Environmental Conservation zones. A small area at the southwestern corner of the site was also zoned SP2 Infrastructure to accommodate drainage infrastructure. The gazettal of the Planning Proposal established that the proposed development is consistent with the strategic context pertaining to the site (refer **Section 3.0**).

As noted above, the proposed development was declared as State Significant Development, as it is considered to have strategic merit in the delivery of housing. The purpose of this declaration was to expedite the approval and subsequently the delivery of housing to achieve the housing delivery targets specified under the National Housing Accord.

Does it comply with the relevant planning controls?	The proposed development is permissible with consent and generally meets the relevant statutory requirements of the <i>Canterbury Bankstown Local Environmental Plan 2023</i> . Importantly, the proposed development is generally consistent with the site-specific development control plan (DCP) which was finalised following the determination of Planning Proposal PP-2021-5837. This Planning Proposal outlined the vision of the future precinct, which importantly, established the future vision of the site.
What are the key findings of the preliminary stakeholder engagement?	Consultation has been undertaken with various stakeholders including relevant government agencies and the public. The key issues raised during the consultation process included those relating to traffic / parking / public transport, footpaths, parks, homes, retail and construction. These concerns have been considered and addressed throughout the design of the project, as detailed in the Engagement Report (Appendix BB). Refer to Section 6.0 for more detail on stakeholder engagement.
What are the key impacts and how will they be managed?	A detailed assessment of the project has been undertaken in accordance with the Secretary's Environmental Assessment Requirements (SEARs). The assessment has found that where there are potential impacts, including: • Tree removal and biodiversity • Noise • Traffic • Residential amenity • Bushfire • Flooding These impacts can be appropriately mitigated and managed to ensure a suitable and appropriate outcome for the site. A summary of the relevant environmental assessment is provided in Section 7.0 of this report.
Who is responsible for approving it?	The Minister for Planning and Public Spaces (or their delegate) will be the consent authority for the project.
Why should it be approved?	The proposed development aims to expedite the delivery of 62 homes whilst delivering the civil and social infrastructure, as well as superlots early on in the project which will accommodate the potential further 368 dwellings to be delivered. The proposed development will deliver significant social and economic benefits by substantially increasing the housing supply in the Canterbury Bankstown LGA, particularly through the rare provision of up to 430 low-density dwellings, supporting housing diversity and contributing to the Housing Accord's target of 14,500 new homes in the LGA. It will create local employment during both construction (up to 20 jobs) and the operational phase of the non-residential uses. The development is consistent with the site's approved zoning, respects local heritage, allows for appropriate site remediation, and has been designed to ensure a compatible interface with surrounding land uses, maintaining amenity for both future and existing residents.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of Mirvac Residential (NSW) Developments Pty Ltd (the applicant) to assess the economic, environmental and social impacts of a State Significant Development Application (SSDA) for a new residential community located at 2 and 2A Bullecourt Avenue, Milperra (the site).

The site was previously used as the Western Sydney University Milperra campus and was recently (2024) the subject of a site-specific planning proposal and development control plan amendment which amended the planning controls that apply to the land to facilitate the redevelopment of the site for predominantly residential land uses.

The development is SSD pursuant to State Significant Development Declaration Order 2025 (No 13) Part 2, Section 4(j). The proposed development outlined in the Housing Delivery Authority (HDA) Expression of Interest (EOI) which was declared SSD will be delivered across two separate SSDA lodgements as detailed under **Section 4.0**. The superlots proposed under this SSDA will facilitate the delivery of the remaining ~368 dwellings, ensuring consistency with the EOI.

This EIS has been prepared in accordance with the requirements under Division 5 of the *Environmental Planning & Assessment Regulation 2021* (EP&A Regs) and having regard to the SSD Guidelines and Industry-Specific SEARs issued on 30 October 2025 for the SSDA. It is submitted to the NSW Department of Planning, Housing and Infrastructure (the Department) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This EIS is based on the Architectural Drawings prepared by Mirvac Residential (NSW) Developments Pty Ltd (see **Appendix G**) and other technical studies appended to this report (see Appendices List).

1.1 Applicant Details

Table 1 Applicant details

Applicant Details	
Applicant name	Mirvac Residential (NSW) Developments Pty Ltd
Applicant address	Level 28, 200 George Street Sydney NSW 2000 Australia
ABN	29 609 513 135

1.2 Project Overview

The proposal seeks development consent for:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of 62 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in 62 residential lots, infrastructure lots, remaining superlots across the site, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre, and
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

This SSDA comprises all civil works across the entirety of the site as well as the construction of all 62 dwellings in “Stage 1” and “Stage 2” only. A description of the proposed staging of works across the development sought within this SSDA is as follows:

- Stage 1 – Tree removal (where proposed) and remediation of contaminated lands across the site, creation of two (2) super lots and 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwelling houses within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the ‘Central Park’.

- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre (which will cease operation during Stage 3 works), construction of a new carpark to service the childcare centre and E1 Local Centre zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the ‘Southern Park’, all to be dedicated to the Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the ‘Northern Park’, all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

A second SSDA, as detailed under **Section 4.1**, will be submitted for the remaining works to complete the overall project.

1.3 Project Objectives

The principal project objective is to deliver a residential neighbourhood comprising a range of low-rise housing typologies and supporting social infrastructure. Specifically, the project objectives include:

- Delivering 62 new houses and remaining superlots to facilitate up to 430 new dwellings on the site.
- Delivering new social infrastructure, including three (3) public parks, embellished to provide appropriate open space to service the future neighbourhood and surrounding residents.
- Increase neighbourhood amenity for current and future residents of the locality.
- Delivering an appropriate road network which provides adequate permeability and servicing for future residents.
- Integrate ecologically sustainable development (ESD) principles into the design to achieve sustainable building principles and improve the site’s environmental and social performance.

1.4 Project Timing

The SEARs issued required the EIS to consider the timelines for delivery expressed in the HDA EOI. The EOI stated “Mirvac will deliver the homes, with all homes under construction prior to July 2029 contributing to established targets set by the Housing Accord”. Assuming a 275-day assessment period as specified in the Guide to Faster Assessments for SSD Housing Applications, this SSDA is anticipated to be determined in August 2026. Subsequently, construction is anticipated to commence at the start of 2027 and conclude before the end of 2028. For the second SSDA, Mirvac is committed to working towards a June 2026 SSDA lodgement. Assuming the same assessment timeline, the second SSDA is anticipated to be determined in March 2027, with construction commencing and concluding in late 2027 and early 2030 respectively. The proposed development (and overall project) is therefore expected to be delivered in accordance with the timeframes specified in the HDA EOI.

1.5 Project Background

1.5.1 Planning Proposal PP-2021-5837

In July 2020, a planning proposal (PP-2021-5837) was submitted to the Council for the rezoning of the land to facilitate the comprehensive redevelopment of the site for primarily low-rise residential accommodation. The planning proposal included a site-specific Development Control Plan (DCP) and draft Voluntary Planning Agreement (VPA). In October 2023, the Council resolved to finalise the site-specific DCP and execute the VPA. The VPA specifies that the Developer is required to fulfill the following commitments:

- Dedication of land to Council, including the three (3) proposed parks, drainage areas and roads.
- Delivery of infrastructure, facilities and services, including roads, embellishment of open space and provision of cycleways as Works in Kind.

- Payment of monetary contributions of \$5,300,180 and \$392,400 by the developer to be applied towards the provision of affordable housing in the Canterbury Bankstown LGA and the repair and renovation of the Milperra Community Centre respectively.

In June 2024, the rezoning was finalised and the *Canterbury-Bankstown Local Environmental Plan 2023* (CBLEP 2023) was amended in accordance with the planning proposal, including rezoning the land to R1 General Residential, RE1 Public Recreation, B1 Local Centre, and C2 Environmental Conservation zones. A small area at the southwestern corner of the site was also zoned SP2 Infrastructure to accommodate drainage infrastructure.

Notably as part of the rezoning finalisation, the Department adopted a site-specific biodiversity mapping overlay (clause 6.4 of the CBLEP 2013) to promote retention of certain tree communities within the proposed residential land.

The site-specific DCP (Section 11.13 of the Canterbury-Bankstown DCP 2023) includes a Structure Plan which sets out the proposed road layout and widths, design considerations for the various housing forms including building setbacks, landscape coverage, carparking requirements, tree planting and public domain improvements.

1.5.2 Development Applications

Since the finalisation of the planning proposal, the applicant has submitted multiple development applications (DAs) to the Council. The following applications remain a relevant consideration in this DA:

- DA-526/2025 – Use of a temporary Builders Structure as a Temporary Sales Office – this DA was approved 21 August 2025.
- DA-1512/2023 - Demolition of all buildings and structures in four stages. The works include the disconnection of utility services and the demolition of all buildings to ground level – this DA was approved on 31 May 2024 and works have been completed, with all existing buildings other than the existing childcare centre and temporary sales office being removed from the site.

A series of other DAs were submitted with the Council for various subdivision works, construction of dwellings, civil and stormwater works, and the alteration and addition to the existing childcare centre on the site. These DAs were recently withdrawn by the applicant at the request of the Council.

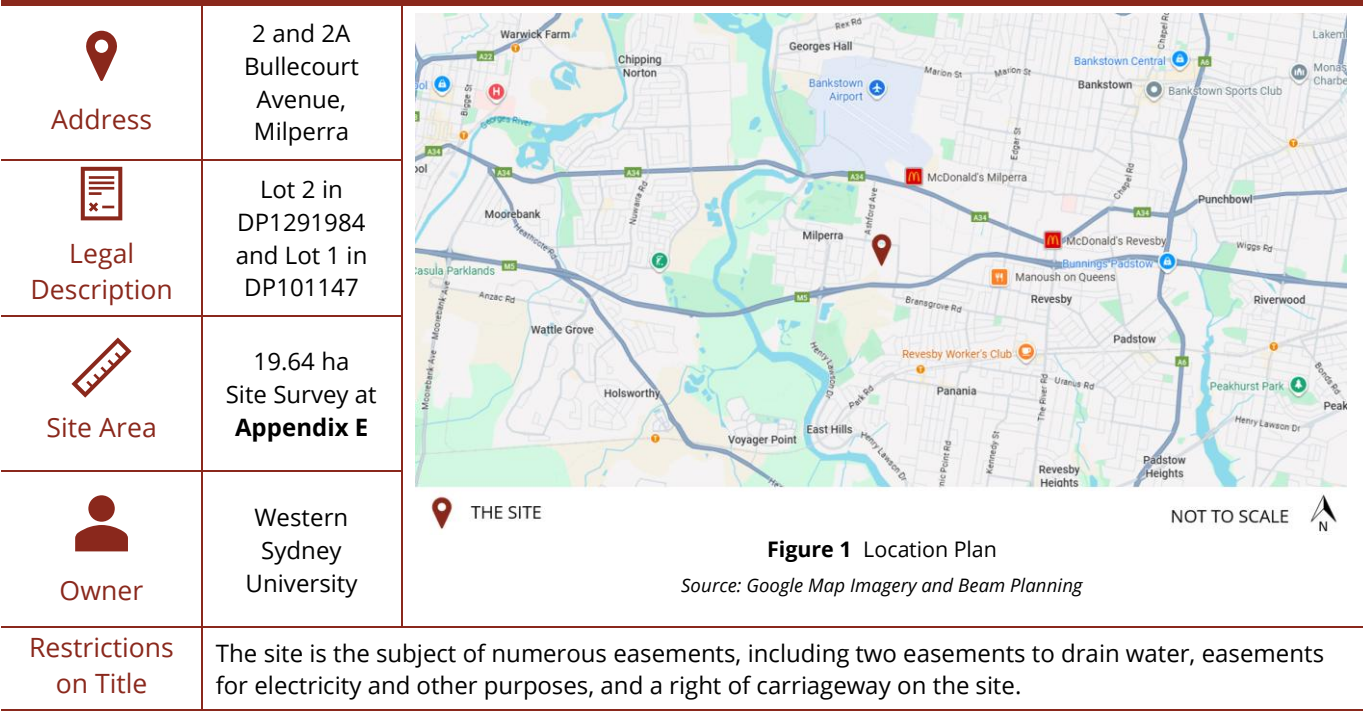
The feedback received on these DAs can be summarised as Council requiring a more comprehensive assessment of the proposed development in the context of the wider site, in the absence of each DA being able to be independently assessed. The current approach to submit a comprehensive SSDA is anticipated to resolve these matters.

The site also benefits from consent DA-752/2011, which granted consent for a new sixty-seven (67) place childcare centre including associated external works, play area and landscaping. Notably the childcare centre will not be operational during Stages 1 and 2 of the proposed development. As specified under **Section 4.0**, the childcare centre will become operational following the works required to facilitate access to the childcare centre in Stage 3.

2.0 Site Analysis

This chapter of the EIS identifies the key features of the site and surrounds pertinent to the development and which the design of the proposal responds to.

2.1 About the Site



As shown in **Figure 2**, the site is bound by the M5 Motorway to the south, Ashford Avenue / existing residential dwellings to the west, Bullecourt Avenue / existing industrial development to the north, and Horsley Road / existing industrial development to the east. Mount St Joseph Catholic College adjoins the site at the southeastern boundary. A substantial number of bus stops are located along Bullecourt Avenue and Horsley Road, servicing routes that connect passengers both within and beyond the LGA, including direct links to Bankstown Central (approximately 8.5km drive from the site), Westfield Burwood, and Westfield Miranda. While the nearest train line is the T8, accessible via East Hills, Panania, and Revesby stations, the T6 line at Bankstown Station can also be reached via bus from the site.



 THE SITE

Figure 2 Aerial Photo

Source: Spatial Viewer and Beam Planning

NOT TO SCALE 

2.2 Key Information about the Site

Table 2 below provides a summary of the key characteristics of the site.

Table 2 Site characteristics

- Since the demolition of the previous buildings on the site, the site currently comprises:
- Existing at-grade car park (located to the west of the existing entry point on Bullecourt Avenue) to be repurposed as parking and hardstand area for the temporary sales office.
 - Existing at-grade car park servicing the existing childcare centre (generally within the location of the future Road 2B).
 - At-grade roads.
 - Outdoor recreation spaces including a large oval to the south.
 - The Western Sydney University Early Learning Centre (Child-care centre).
 - Vegetation of varying significance, including Cumberland Plain Woodland.



Figure 3 View of the site from the vehicular access at Bullecourt Avenue



Figure 4 The cleared site



Figure 5 View of the existing childcare centre



Existing
Development

A variety of trees are dispersed throughout the site, serving purposes such as landscaping, screening, and shading. Vegetation is distributed across the central areas of the site and within car parks, providing visual screening from adjacent areas, including the South-Western Motorway to the south, student accommodation along Ashford Avenue, and partially along Bullecourt Avenue. Shrubs are also planted around buildings and open spaces. The southern section of the site is primarily turf, designated for use as a sports field and athletics facility.

As shown in the below **Figure 6**, approximately 60% of the site is mapped as “biodiversity” under the CBLEP 2023.



Figure 6 Biodiversity mapping of the site (outlined in red) under the CBLEP 2023

Source: Canterbury Bankstown Council

The site contains an area of Cumberland Plain Woodland within the conservation zoned land at the northeast portion of the site. In addition to this biodiversity, the site contains a total 600 trees / tree groups which have been assessed by the project arborist. The site contains Biodiversity Values Mapping (refer **Figure 7**). The quality and retention value of the vegetation is discussed in **Section 7.1**.



Figure 7 Biodiversity values map (non-EPI)

Source: Planning Portal Spatial Viewer



The site is currently fenced off due to recent demolition works and subsequently is not publicly accessible – hoarding is located along Ashford Avenue and Bullecourt Avenue frontages. Vehicular access points, although also fenced off, are available from Ashford Avenue, Bullecourt Avenue and Horsley Road.



As shown in **Figure 8**, the site does not contain a heritage item nor is it in a heritage conservation area. However, the site is located adjacent to Ashford Avenue and Bullecourt Avenue which is listed as a heritage item I218 Milperra Soldier Settlement (former) within CBLEP 2023.



Figure 8 Heritage mapping of the site (outlined in red)

Source: Canterbury Bankstown Council



As shown in **Figure 9**, the site is mapped as containing bush fire prone land classed as “Vegetation Buffer” and “Vegetation Category 2”.



Figure 9 Bushfire mapping of the site (outlined in red)

Source: Planning Portal Spatial Viewer



As shown in **Figure 10**, portions of the site are affected by the Probable Maximum Flood (PMF) as well as the 1 in 100 year Annual Exceedance Probability (AEP).

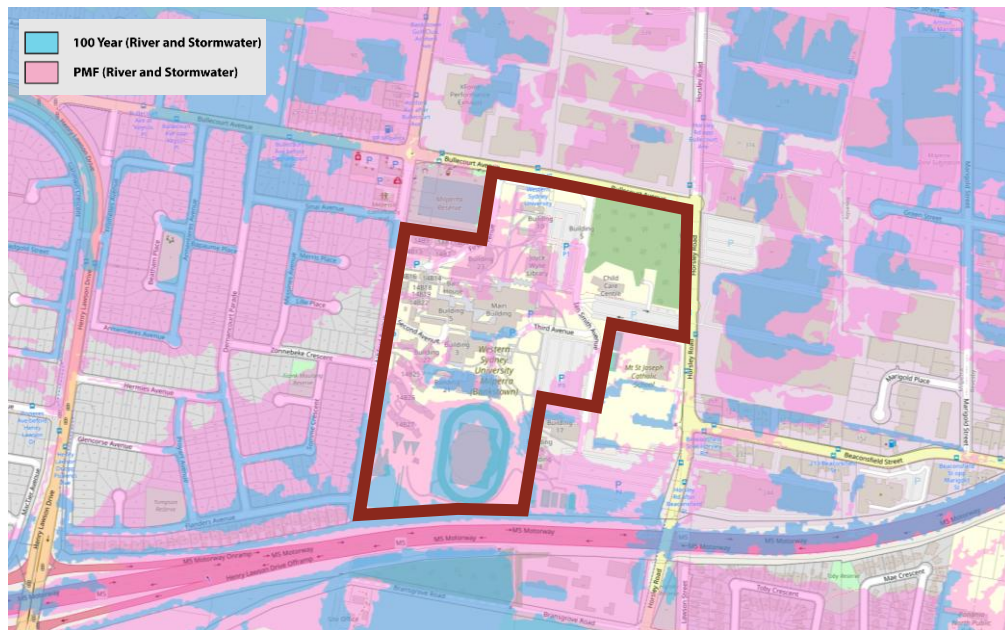


Figure 10 Flood mapping of the site (outlined in red)

Source: Canterbury Bankstown Mapping



Topography

The site slopes downward from the northern frontage on Bullecourt Avenue (approximately RL 15m to RL 17m) to the southern boundary adjoining the M5 Motorway (approximately RL 3m to RL 6m), resulting in an overall elevation change of around 14m. It is important to note that the site's topography has been significantly altered by past activities, with noticeable disturbance throughout. The most pronounced slope occurs in the southern portion of the site, particularly around the former open space and vegetated areas, where the gradient is steepest near the southern boundary to the M5 Motorway.

2.3 Surrounding Context

Table 3 Surrounding development context

North	To the north of the site is industrial development comprising various size tenancies. A driveway to the industrial development exists opposite the primary access to the site on Bullecourt Avenue.
South	The site is bound to the south by the M5 South-Western Motorway, and beyond this is the Kelso Waste Facility, which was subject to a previously adopted Masterplan to convert it to the Kelso Community Recycling Centre. Construction of this centre is anticipated to be completed in early 2027.
East	The southern side of the eastern boundary is directly adjacent to the Mount St Joseph Catholic College and then Horsley Road. The northern portion of the eastern boundary is also bound by Horsley Road, which stands between the site and industrial development, which notably includes the approved industrial development at 270 Horsley Road (SSD-51147710). The 270 Horsley Road SSD was granted consent for the construction of a two-storey warehouse and distribution centre with a total gross floor area (GFA) of 71,783m ² , comprising twelve warehouse tenancies, ancillary office space, end-of-trip facilities, and a café.
West	To the west of the site is Ashford Avenue and beyond this is existing residential development comprising dwelling houses and some dual occupancies.

3.0 Strategic Planning Context

This chapter identifies the key strategic issues that are relevant to the assessment of the project, including the projects consistency with relevant Government policies, the strategic planning framework, the relationship with other surrounding development and any planning agreements. The chapter also analyses the alternative development options explored and justifies the current proposal in context of the strategic planning framework.

3.1 Strategic Planning Framework

This section identifies the key strategic issues that are relevant to the assessment of the project, including the projects consistency with relevant Government policies and the strategic planning framework as set out in **Table 4**.

Table 4 Summary of strategic context

Strategic Plan	Strategic Context
National Housing Accord 2022	The National Housing Accord (the Accord) is a housing initiative that aims to increase affordable housing supply by 1.2 million over a 5-year period from mid-2024. Supported by all levels of government, investors and the construction sector, the Accord includes federal funding of \$3.5 billion to state, territories and local government to deliver housing targets, including \$350 million to deliver 10,000 affordable homes. State and territory governments have agreed to an additional 10,000 affordable homes, increasing the total of up to 20,000 affordable homes. Under the Accord, NSW has agreed to build 377,000 new homes and 3,100 affordable homes. The NSW Government has allocated the City of Canterbury Bankstown LGA to deliver 14,500 new homes by 2029. The HDA has facilitated the nomination of well-located sites, such as the subject property, that have the environmental capacity to support additional dwellings to contribute to the achievement of the National Housing Accord targets. The proposed development will contribute to this housing target by providing an additional 62 dwellings and facilitating a future development which can contribute a total 430 dwellings. The proposed dwellings are well located and situated within areas of existing infrastructure, in close proximity to public transport, local centre amenities, public recreation facilities, educational premises and community facilities. Additionally, the proposed development will facilitate further access to social infrastructure through the provision of embellished open space and other supporting uses such as the centre based childcare facility. As such the proposed development aligns with the objectives of the National Housing Accord and appropriately contributes to the achievement of the National Housing Accord targets.
Housing 2041 – NSW Housing Strategy	Housing 2041 is the NSW Government's 20-year vision for the delivery of housing across the state. The strategy reiterates the Government's 20-year commitment to achieving secure, comfortable, diverse, affordable and resilient housing. Housing 2041 establishes four pillars which underpin the future of housing, and the proposed development is closely aligned with each of these pillars in the following manner: • Supply: The proposed development will contribute 62 new dwellings and facilitate the future development of a total estimated 430 dwellings. • Diversity: The proposed development includes the provision of low density housing. The National Housing Accord's target has encouraged the provision of high quality housing in a timely manner, which has encouraged the construction of predominantly high density housing typologies. The provision of low rise housing will aid in maintaining a diverse housing portfolio whilst still delivering adequate supply within the Accord Period. • Affordability: The proposed development requires the execution of the Voluntary Planning Agreement (VPA) which, among other requirements, requires a payment of \$5,300,180 by the proponent to Canterbury Bankstown Council for the purposes of affordable housing. Further it is noted that the smaller residential allotments proposed within this development compared to the existing surrounding residential suburbs will deliver a more affordable product for contemporary dwellings. • Resilience: The proposed development includes the provision of landscaped open spaces and street tree planting, contributing to an overall canopy coverage of 37.4% across the site. Additionally, the development will align with the principles of ecologically sustainable development, contributing to a development outcome that is highly sustainable.
Greater Sydney Region Plan: A Metropolis of Three Cities	The Greater Sydney Region Plan is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. The Plan provides housing targets to inform the District Plans for a 0–5-year timeframe, as well as Council specific 6–10-year targets for LGAs. The 0–5-year housing target for the South District is 23,250 and the 20-year strategic housing target is 83,500. The consistency of the proposed development with the directions of the Greater Sydney Region Plan is outlined below.

Strategic Plan	Strategic Context	
	Infrastructure and Collaboration	The proposed development is strategically aligned with this overarching objective as it builds upon and strengthens existing transport and service connections to key centres. The site is well-positioned within an established public transport network, with numerous bus stops along Bullecourt Avenue and Horsley Road providing frequent services that connect residents to major commercial and employment hubs such as Bankstown Central (approximately 8.5 km away), Westfield Burwood, and Westfield Miranda. These connections also facilitate access to the T8 train line via East Hills, Panania, and Revesby stations, and to the T6 line at Bankstown Station, enabling regional mobility and reducing reliance on private vehicles. By complementing these established transport links with new internal roads, shared paths, and local amenities, including parks, community parking, and upgraded infrastructure, the project supports integrated urban growth that leverages existing infrastructure, enhances accessibility to centres, and contributes to a well-connected and sustainable provision of housing in Milperra.
	Liveability	The proposed development strongly supports this overarching objective by delivering a well-designed, connected, and amenity-rich neighbourhood that enhances quality of life for existing and future residents. The inclusion of three public parks, shared paths, and landscaped public domains promotes walkability, active lifestyles, and social interaction, while the provision of a car park serving the existing childcare centre and nearby E1 Local Centre strengthens access to essential community services. The site's proximity to multiple bus routes along Bullecourt Avenue and Horsley Road, and convenient connections to centres, ensures residents enjoy high levels of accessibility to jobs, education, and retail opportunities. Through the integration of diverse housing types, public open space, and local infrastructure within an environmentally conscious framework that conserves over 2 hectares of Cumberland Plain Woodland, the project fosters an inclusive, healthy, and sustainable community consistent with the Region Plan's vision for liveable, accessible, and socially supported places.
	Productivity	The proposed development is consistent with the Productivity objectives by contributing to the vision of a 30-minute city, where residents can conveniently access jobs, education, and services through efficient public transport connections. Located within an established transport corridor, the site benefits from access to bus routes that link directly to employment and commercial centres such as Bankstown, Burwood and Miranda, and provide access to the T8 and T6 train lines. This high level of connectivity ensures future residents can easily reach key centres within 30 minutes, supporting economic participation and reducing travel times. By delivering a potential 430 new dwellings in proximity to these employment hubs, the project brings housing closer to jobs and services, helping to balance housing and employment growth throughout Sydney. The integration of transport, housing, and local infrastructure within this development reinforces productivity by supporting workforce accessibility, local economic vitality, and more sustainable patterns of urban development.
	Sustainability	The proposed development aligns with the sustainability objectives of the Greater Sydney Region Plan by integrating environmentally responsible design measures that enhance resilience, reduce urban heat, and support ecological health. A key feature of the proposal is the achievement of 37.4% tree canopy coverage across the site, which will significantly reduce urban heat island effects, improve air quality, and create a cooler, more comfortable environment for residents. The inclusion of three public parks and landscaped open spaces further supports biodiversity by increasing habitat connectivity, provides natural shading, and encourages outdoor recreation, contributing to both environmental and community wellbeing. In addition, the project allows for the installation of solar panels across dwellings to promote renewable energy generation and reduce carbon emissions. Combined with the conservation and management of over 2 hectares of Cumberland Plain Woodland, these measures demonstrate a holistic approach to sustainability that balances urban development with environmental protection, supporting the Greater Sydney Region Plan's goal of a greener, cooler, and more energy-efficient city.
Our Greater Sydney 2056: South District Plan	The South District Plan underpins the Greater Sydney Region Plan and sets out the 20-year vision for the district through 'Planning Priorities' that are linked to the Region Plan. As demonstrated above, the proposed development is strategically aligned with the overarching objectives of the Regional Plan. The South District Plan carries these objectives through and provides the following planning priorities, which the proposed development aligns with: • Planning Priority S1 - Planning for a city supported by infrastructure: As noted above, the proposed development leverages the connectivity of the existing public transport network. Given the accessibility	

Strategic Plan	Strategic Context
	of public bus routes in proximity to the site, and subsequently access to surrounding trainlines, the site is well-positioned to offer future residents adequate access to existing infrastructure. • Planning Priority S2 - Working through collaboration: The VPA will allow for the delivery of public infrastructure across the site, including the provision of roads, cycleways and footpaths and importantly, three new public open spaces. All of these elements will be dedicated to Council through the VPA. • Planning Priority S3 - Providing services and social infrastructure to meet people's changing needs: As part of the proposed development, three public parks will be delivered, shared paths and roads. This integrated approach promotes active transport options for existing and future residents, supporting a more diverse and adaptable infrastructure network that meets the evolving needs of the LGA's growing (and diverse) population. • Planning Priority S4 - Fostering healthy, creative, culturally rich and socially connected communities: As noted, the proposed development includes the provision of social infrastructure designed to foster a cohesive and connected future community, supported by enhanced access to open spaces and active transport options. The northern, central, and southern open space areas are envisioned as key destinations offering high levels of amenity, encouraging extended use and facilitating stronger social connections among residents and visitors. • Planning Priority S5 - Providing housing supply, choice and affordability with access to jobs, services and public transport: The proposed development has the potential to deliver up to 430 dwellings within the Housing Accord Period, in an area which encourages use of public transport to access Centres across central and southern Sydney. • Planning Priority S6 - Creating and renewing great places and local centres, and respecting the District's heritage: The proposed development will utilise a currently predominantly vacant site, and contributes to the preservation of the heritage items in the site's vicinity. • Planning Priority S12 - Delivering integrated land use and transport planning and a 30-minute city: As noted, the proposed development will leverage the existing transport connections in the site's vicinity, with access to Bankstown, Burwood and Miranda via bus, as well as the T8 and T6 trainlines. • Planning Priority S14 - Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes and better managing rural areas: The proposed development includes the conservation of approximately 2 ha of Cumberland Plain Woodland Species through the creation of a community title lot which facilitates the ongoing management of the land, and significantly contributes to habitat connectivity through the provision of complementary plantings. • Planning Priority S15 - Increasing urban tree canopy cover and delivering Green Grid connections: The proposed open spaces are appropriately distributed throughout the site and are connected via an extensive street tree planting plan, which will provide adequate shading for people moving between parks. Overall, the site proposes a tree canopy coverage of 37.4%. • Planning Priority S16 - Delivering high quality open space: The proposed public open spaces provide a diverse range of features, including trails, play areas, bike racks, picnic facilities, and supporting soft infrastructure. Their design prioritises high-quality, multifunctional spaces that encourage active use and enjoyment by future residents. • Planning Priority S17 - Reducing carbon emissions and managing energy, water and waste efficiently: Proposed dwellings have been equipped with solar panels to encourage use of renewable energy sources and have been designed to incorporate passive cooling elements.
City of Canterbury Bankstown's Local Strategic Planning Statement: Connective City 2036	The Connective City 2036 is Canterbury Bankstown's Local Strategic Planning Statement (LSPS) and is the principal strategic planning document guiding land use planning and development in the LGA. The LSPS represents the City of Canterbury Bankstown's 20-year vision and strategy for the LGA's future direction and contains objectives on infrastructure and collaboration, housing, liveability, productivity and sustainability. The LSPS draws from other State strategic documents and implements these targets at a local level. The proposed development is consistent with the Evolutions of the LSPS, including the following: • Evolution 5 - Green Web: The LSPS identifies Canterbury-Bankstown's Green Web as a network linking regional and local parklands, natural and urban waterways, and walking and cycling routes to create an extensive, interconnected system of ecological and recreational spaces across the city. This initiative contributes to the broader Greater Sydney Green Grid. The proposed development is strategically aligned with this objective through the inclusion of three green open spaces and extensive street tree plantings, achieving an overall canopy cover of 37.4% across the site. The street tree planting plan will significantly enhance walkability, strengthening connections between open spaces and the surrounding neighbourhood. • Evolution 6 - Urban and Suburban Places, Housing the City: The LSPS envisions a housing profile which allows people and families to access homes that meet their needs in terms of size, design, location and price. People also need to be able to easily access their work, shops, services, transport, social networks and open space to support their day-to-day life. When we make decisions about where to locate new housing, we consider these needs, and how people can become part of a community that features quality civic space, entertainment and leisure opportunities. The proposed development will provide greater diversity of housing across the LGA through the provision of low rise housing, which is in

Strategic Plan	Strategic Context
	alignment with the surrounding housing profile. The proposed development also contributes to supporting uses for the future neighbourhood, including social infrastructure, a childcare centre and supporting commercial uses.
Canterbury Bankstown Housing Strategy	The Canterbury-Bankstown Housing Strategy provides a framework to guide the supply, diversity, and location of housing across the LGA to meet the current and future needs of the community. Its purpose is to ensure that housing is well-designed, appropriately located, and accessible to a range of people and households, including families, seniors, and first-time homebuyers. The strategy seeks to balance growth with the protection of local character, while promoting sustainable, connected, and vibrant neighbourhoods that offer access to employment, services, transport, and open space. The proposed development aligns with the Canterbury Bankstown Housing, specifically, the following strategic directions: • Strategic Direction 1 - Deliver 50,000 new dwellings by 2036 subject to the NSW Government providing upfront infrastructure support: The proposed development will contribute up to 430 dwellings within the Housing Accord Period, contributing to Council's 2036 goal. • Strategic Direction 3 - Focus at least 80% of new dwellings within walking distance of centres and places of high amenity: The proposed development will provision high amenity spaces for existing and future residents, including through the provision of green open spaces and street tree plantings which will encourage a more walkable neighbourhood. Notably, residents will have access to existing shops on Ashford Avenue and Bullecourt Avenue to the north west of the site. • Strategic Direction 4 - Ensure new housing in centres and suburban areas are compatible with the local character: The proposed development is designed to seamlessly integrate with the existing residential neighbourhood in Milperra to the west. Its scale reflects an appropriate density that complements the surrounding residential character, while also creating opportunities for the broader community to access open spaces and other complementary services. • Strategic Direction 6 - Design quality housing to maximise liveability and provide positive built form outcomes: The proposed development features a built form that is compatible with the existing neighbourhood and provides adequate amenity for future residents.
Future Transport 2056	The Future Transport 2056 Strategy (FTS) sets out the NSW Government's vision for transport in a growing and changing state. It guides the community on strategic directions for future planning integrated with evolving transport networks throughout the Sydney metropolitan area and the state. The FTS delivers a framework that informs place-based planning and policy decisions to achieve successful outcomes, aiming to connect NSW through a world-class, safe, accessible, efficient and reliable transport system. The proposed development aligns with the following objectives of the FTS through the provision of housing in areas with existing transport infrastructure, connecting the site to the Bankstown City Centre as well as centres beyond the LGA, including Miranda and Burwood.
Better Placed	<i>Better Placed</i> is a design policy that aims to improve the quality of the built environment. It promotes and supports better outcomes for places and spaces in response to the challenges faced in NSW including health, growth and urban renewal. Ultimately, the policy prioritises the community to ensure that all future development improves quality of life. The proposed development satisfies the following objectives below: • Better fit: The proposed development is an extension of the existing residential development to the west and therefore appropriately integrates with surrounding development. Additionally, the proposed development offers additional social infrastructure such as the three public open spaces, which will not only serve the future residents of the proposed development but also those existing in the site's vicinity. The proposed development also has an appropriate interface with industrial uses to the east and north and appropriately mitigates any potential future conflicts between uses. • Better performance: The development aligns with environmental sustainability and responsiveness by utilising sustainable materials and providing green space which will contribute to the local ecology and reduce carbon emissions. • Better for community: The predominantly vacant site presents an opportunity to better serve the community by way of introducing greater housing opportunities, the provision of open space, and a more permeable road network. The overall usability of the site will increase significantly, especially in consideration of future access to open spaces. • Better for people: The proposed development incorporates appropriate Crime Prevention Through Environmental Design (CPTED) principles and overall a high amenity for future residents. The provision of greater street tree plantings will contribute to comfort and encourage active forms of transport, further contributing to usability. • Better working: The proposed development is efficient in its street network and distribution of open space, allowing for more equitable access to social infrastructure for existing and future residents. • Better value: The proposed development is of a high design quality and therefore is anticipated to contribute to a better built environment for a longer time. • Better look and feel: The proposed development is of a high quality design through the provision of 62 high quality dwellings, embellished open spaces, vegetated streetscapes, and appropriate interfaces between proposed uses.

Strategic Plan	Strategic Context
Connecting with Country	The <i>Connecting with Country</i> framework is essential in maintaining and protecting Aboriginal heritage and uniting Aboriginal and non-Aboriginal people to work together in project development. In alignment with international and domestic laws and policies, the framework aims to remedy the continuous impacts of colonisation and provide a voice to Aboriginal people in development. The framework encourages reliance on local Aboriginal knowledge of Country to preserve and care for the land, along with supporting the local Aboriginal community. Community consultation with local Aboriginal people has informed the design of this proposed development, with key design elements incorporating and reflecting the local Aboriginal history, ecology and cultural values.

3.2 Cumulative Impacts

The cumulative impacts of the proposed development as well as the SSDA (SSD-51147710) for the adjacent site to the west at 270 Horsley Road has been considered in the preparation of technical reports for this SSDA. That SSDA granted consent for the construction of a two-storey warehouse and distribution centre with a total gross floor area (GFA) of 71,783 m², comprising twelve warehouse tenancies, ancillary office space, end-of-trip facilities, and a café (refer **Figure 11** for an artist impression of the approved development).

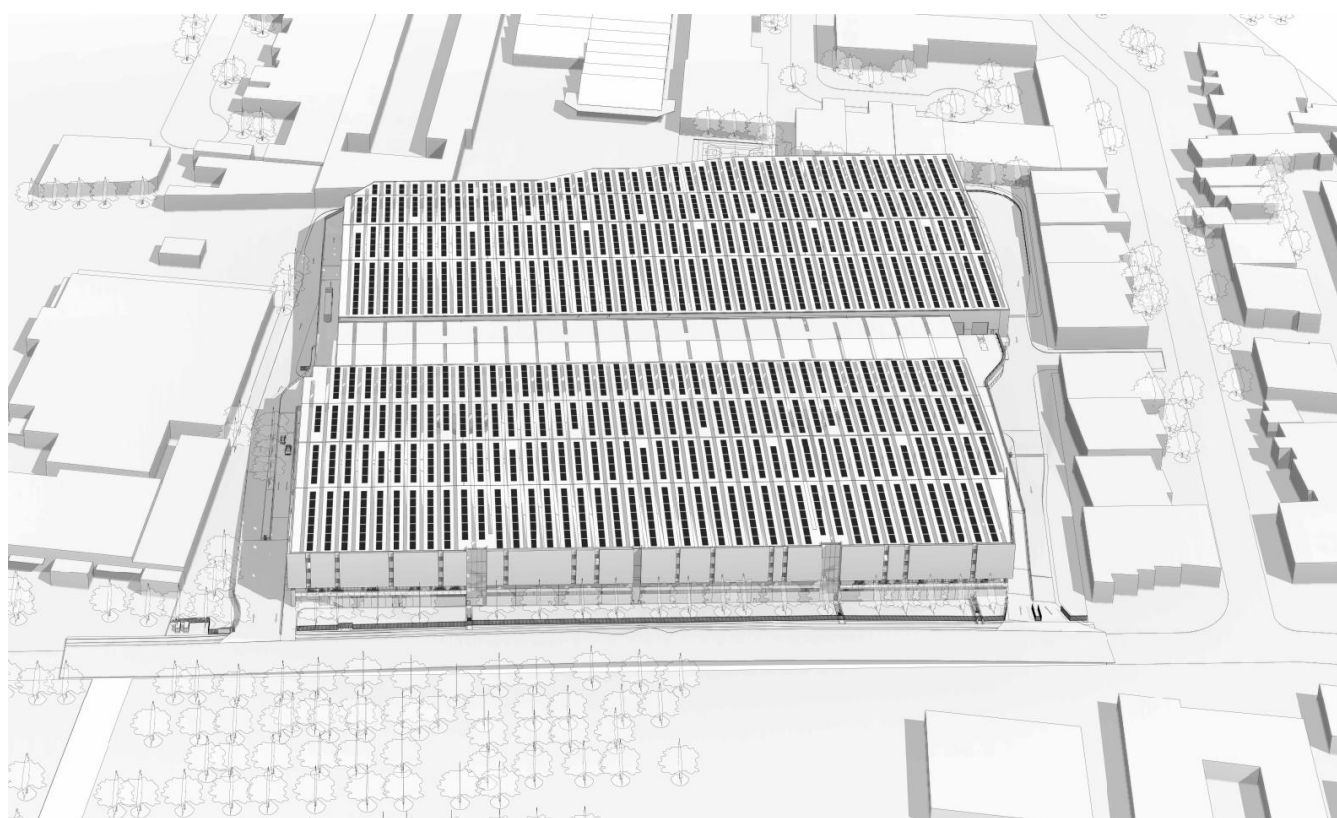


Figure 11 Artist Impression of the Approved Development at 270 Horsley Road

Source: SBA Architects

The SSDA also included approval for the consolidation of allotments, creating a site area of approximately 7.12ha with vehicular access from both Horsley Road and Beaconsfield Street. According to the Department's Assessment Report, the approved development is expected to generate up to 873 construction jobs and 695 ongoing operational jobs.

Importantly, this development has been considered in the preparation of this SSDA, specifically under the Traffic Impact Assessment (TIA) prepared by The Transport Planning Partnership (refer **Appendix U**) and the Acoustic Assessment prepared by Renzo & Associates (refer **Appendix W**).

3.3 Project Agreements

In October 2023, Council executed the VPA ahead of the finalisation of the Planning Proposal. The VPA specifies that the Developer is required to fulfill the following commitments in relation to the proposed development:

- Payment of Monetary contributions of \$5,300,180 and \$392,400 by the developer to be applied towards the provision of affordable housing in the Canterbury Bankstown LGA, and the repair and renovation of the Milperra Community Centre respectively.

- Delivery of infrastructure, facilities and services, including roads, embellishment of open space and provision of cycleways as Works in Kind.
- Dedication of land to Council, including the three proposed parks, drainage areas and roads.

Further detail of the required contributions and the timeline for their delivery is detailed below and can be found at **Appendix HH**.

3.3.1 Monetary Contributions

Specifically, the monetary contributions required to be paid are:

- **Affordable housing contribution:** A total \$5,300,180 (\$12,326 per lot for the 430 lots established under the Planning Proposal) affordable housing contribution is required to be paid. The VPA specifies that \$12,326 is to be paid prior to the registration of the subdivision certificate for a residential lot. As the SSDA is expected to generate less than 430 dwellings, the remaining balance of the affordable housing contribution is to be paid within 15 days of the registration of the last lot (throughout stages 1 – 7 and under SSDA lodgement 1 and 2).
- **Milperra Community Contribution:** the contribution is required to be paid prior to the release of the subdivision certificate for the 201st residential lot (within stage 5 and under SSDA lodgement 2).

3.3.2 Works in Kind

Specifically, the works in kind contributions required to be delivered are:

- **Open space embellishment (northern open space):** works are to be completed prior to the dedication of land and prior to the issue of the occupation certificate for the first dwelling fronting the RE1 land (within stage 6 under SSDA lodgement 1).
- **Open space embellishment (southern open space):** works are to be completed prior to the dedication of land and prior to the issue of the occupation certificate for the first dwelling fronting the RE1 land (within stage 4 and under SSDA lodgement 1).
- **Open space embellishment (central open space):** works are to be completed prior to the issue of the occupation certificate for the 50th dwelling, or for the first dwelling fronting the open space (within stage 2 and under SSDA lodgement 1).
- **Local road construction:** works are to be completed prior to the dedication of land and prior to the release of any subdivision certificate fronting that road (throughout stages 1 – 7 and under SSDA lodgement 1).
- **Shared cycleway construction (referred to in civil plans as the shared path):** works are to be completed prior to the release of any subdivision certificate fronting that cycleway (throughout stages 1 – 7 and under SSDA lodgement 1).
- **Milperra Reserve Embellishment:** works are to be completed prior to the release of the subdivision certificate that would create the last residential lot (within stage 7 and under SSDA lodgement 2).
- **Remnant vegetation works:** works are to be completed prior to the release of the subdivision certificate that would create the last residential lot (within stage 7 and under SSDA lodgement 2).
- **SP2 Infrastructure (drainage) works:** works are to be completed prior to the release of the subdivision certificate that would create the last residential lot (within stage 4 and under SSDA lodgement 2).
- **Local road construction (footpaths):** works are to be completed prior to the release of any subdivision certificate fronting that footpath (throughout stages 1 – 7 and under SSDA lodgement 1).
- **Undergrounding of powerlines:** works are to be completed prior to the release of the occupation certificate for the last dwelling house fronting Ashford Avenue (within stage 1 and under SSDA lodgement 2).
- **Ashford Avenue footpath:** works are to be completed prior to the release of the occupation certificate for the last dwelling house fronting the footpath (within stage 1 and under SSDA lodgement 1).
- **Cycleway:** works are to be completed prior to the release of the subdivision certificate for the 201st residential lot (within stage 5 and under SSDA lodgement 2).

3.3.3 Dedication of Land

Specifically, the dedication of land is as follows:

- **Northern Open Space:** to be carried out prior to the release of subdivision certificate for the 301st residential lot (within stage 6 and under SSDA lodgement 2).
- **Central open space:** to be carried out prior to the release of subdivision certificate for the 201st residential lot (within stage 5 and under SSDA lodgement 2).

- **Southern open space:** to be carried out prior to the release subdivision certificate of the last residential lot on the land (within stage 7 and under SSDA lodgement 2).
- **Local roads:** to be carried out prior to the subdivision certificate being issued for a residential lot which fronts that road (throughout stages 1 – 7 and under SSDA lodgement 1 and 2).
- **Local roads (minor):** to be carried out prior to the subdivision certificate being issued for a residential lot which fronts that road (throughout stages 1 – 7 and under SSDA lodgement 1 and 2).
- **SP2 Infrastructure (Drainage):** to be carried out prior to the release of the last residential subdivision certificate (within stage 7 and under SSDA lodgement 2).

3.4 Analysis of Alternatives

An analysis of the key options is provided below.

3.4.1 Option 1 – Do Nothing

The site is currently largely vacant and provides no specific public benefit. The previous university use was relocated to a more accessible location, allowing the site to be repurposed for residential development in alignment with current state and federal strategic objectives. If the ‘do nothing’ option were pursued, the site would forego the potential benefits of accommodating up to 430 dwellings, which the overall project could deliver.

3.4.2 Option 2 – Alternative Use

Developing the site for an alternative use is not considered feasible, given the gazettal of the previous Planning Proposal in June 2024 (refer **Section 1.5.1**). That Proposal was intended to facilitate low-rise residential development with supporting uses, resulting in the rezoning of the site from SP2 Infrastructure to R1 General Residential, E1 Local Centre, RE1 Public Recreation, C2 Environmental Conservation, and SP2 Infrastructure. The current zoning reflects the proposed development, which envisions a residential neighbourhood complemented by green open spaces and a small commercial centre. Pursuing an alternative use would require rezoning, which is not considered viable for the project, and would not deliver the same benefits of the project.

3.4.3 Option 3 – Alternative Design

Developing the site to an alternative design would not be appropriate given the previous Planning Proposal and the site-specific DCP. While alternative options were explored during early investigations, the proposed development reflects extensive testing and refinement. Collaboration with Canterbury Bankstown Council has played a key role in shaping the design, and pre-lodgement engagement has addressed matters raised by Council and subsequently fed into the design. Deviating from the proposed development would require reworking the scheme and additional consultation, which would be detrimental to the project. Accordingly, an alternative design is not considered the most suitable option.

3.4.4 Option 4 – Proposed Scheme

The proposed development represents the most desirable and strategic outcome for the site, delivering a vibrant, low-density residential neighbourhood complemented by supporting uses, including a centre-based childcare facility, a small commercial centre, and accessible green open spaces.

The proposal is responsive to current market demand and reflects an evolving approach to housing provision, aligned with both federal and state priorities to increase housing supply while maintaining an appropriate scale that integrates seamlessly with the surrounding residential context. In addition to its alignment with strategic objectives, the proposed development will:

- **Enhance neighbourhood amenity:** The design incorporates principles that ensure a high-quality living environment for future residents, with thoughtfully planned public and private spaces.
- **Increase housing supply and diversity:** The development contributes to meeting the LGA's housing needs within the Housing Accord period, offering a housing typology that will contribute to diversity across the LGA.
- **Provide and improve public spaces and infrastructure:** Residents, both current and future, will benefit from additional green spaces, enhanced public domain treatments, and supporting infrastructure such as footpaths, bike paths, and connectivity to nearby services and facilities.

Overall, the proposed development balances growth, amenity, and integration, delivering a sustainable and vibrant community that supports both current and future residents.

3.5 Project Justification

In consideration of the site's strategic context and the analysis of alternative options available, the current proposal is the most appropriate to achieve the objectives of the project. The proposed development is:

- **Aligned with strategic frameworks:** Consistent with national, state, and local policy objectives, supporting broader planning and housing goals.
- **Responsive to housing needs:** Aims to alleviate housing stress and provide a diverse range of housing options within the Canterbury Bankstown LGA.
- **Informed by extensive engagement:** The design has been shaped through extensive consultation with Canterbury Bankstown Council and engagement with the local community, ensuring that matters raised by stakeholders have been considered and addressed.
- **Delivering high-quality amenities:** Includes key community infrastructure such as three (3) public parks, roads, pathways and cycleways to be dedicated to Council.
- **Integrated with the surrounding neighbourhood:** Designed at an appropriate scale to complement the existing residential context and ensure seamless integration with surrounding developments, including the residential development to the west and industrial development to the east and north.
- **Sustainable and accessible:** Incorporates sustainable design principles, improved connectivity via footpaths and bike paths, and accessibility features to benefit future residents and the wider community.
- **Optimised for long-term value:** Balances density, amenity, and community benefits to create a vibrant, sustainable neighbourhood that aligns with strategic housing and infrastructure objectives.

For a detailed justification of the proposed development, refer to **Section 7.0** of this EIS.

4.0 The Proposed Development

4.1 Summary

The project will be delivered in stages and across two (2) separate SSDAs. Upon completion of the project, the development will comprise the construction of up to 430 dwellings, three (3) public parks, new roads and shared paths, civil infrastructure, an expanded childcare centre, a car park, and the management of conservation land.

Specifically, this first SSDA seeks consent for:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of up to 430 dwellings including houses, dual occupancies and attached dwellings
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in up to 430 residential lots, infrastructure lots, remaining residential superlots, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre, and
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

An Illustrative Masterplan of the proposed development prepared by Urbis is shown at **Figure 12**.



Figure 12 Illustrative Masterplan of the Proposed Development

Source: Urbis

This SSDA comprises all civil works across the entirety of the site as well as the construction of all 62 dwellings in “Stage 1” and “Stage 2” only. A description of the proposed staging of works across the development sought within this SSDA is as follows:

- Stage 1 – Tree removal (where proposed) and remediation of contaminated lands across the site, creation of two (2) super lots and 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwelling houses within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the ‘Central Park’.
- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre (which will cease operation during Stage 3 works), construction of a new carpark to service the childcare centre and E1 Local Centre zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the ‘Southern Park’, all to be dedicated to the Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the ‘Northern Park’, all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

This SSDA does not include the construction of any dedicated affordable housing on the site. Consideration of the provision of affordable housing will be carried out for the second SSDA lodgement, in addition to the payment of monetary contributions towards affordable housing as outlined in the existing VPA which applies to the site.

Figure 13 shows the proposed subdivision and staging plan.



Figure 13 Proposed Subdivision and Staging Plan

Source: Beveridge Williams

The second SSDA will seek consent for all outstanding works in stages 3 to 7, which are as follows:

- Stage 3 – Construction of the proposed alterations and additions to the existing childcare centre to increase the capacity of the centre from 67 (existing) to approximately 95 children, and construction of a permanent structure for the residential sales suite.
- Stage 4, 5, 6 & 7 – Creation of the subsequent subdivision into residential lots and construction of dwellings.

Please note that the total dwelling yield of 385 is indicative only at this stage. A preliminary design assessment of the total dwelling yield has been completed based on the Structure Plan (Figure 2: Concept Plan) of the Canterbury-Bankstown Development Control Plan 2023, Chapter 11.13. The proponent is refining the design in the lead up to SSDA lodgement 2 to deliver a mix of typologies and a dwelling count on the site which is generally consistent with the HDA EOI.

4.2 Subdivision Plan

The details of the proposed subdivision can be found in the Proposed Plan of Subdivision prepared by Beveridge Williams at **Appendix CC** and the ultimate General Arrangement Plan showing the final subdivision layout the subject of this SSDA in **Figure 14**.

The proposed plan of subdivision seeks to create:

- 62 lots to be developed as dwelling houses (refer **Section 4.3**).
- 29 superlots to be further subdivided for residential accommodation under a separate application.

- 3 lots to be utilised as public open space (refer **Section 4.5**) and dedicated to the Council as per the requirements of the VPA.
- 3 lots to be managed under a community title scheme containing the C2 Environmental Conservation zoned land and the E1 Local Centre zoned land.
- 3 drainage reserves (refer **Section 4.8.2**) to be dedicated to the Council as per the requirements of the VPA.
- Resulting road and public domain allotments to be dedicated to the Council as per the requirements of the VPA.

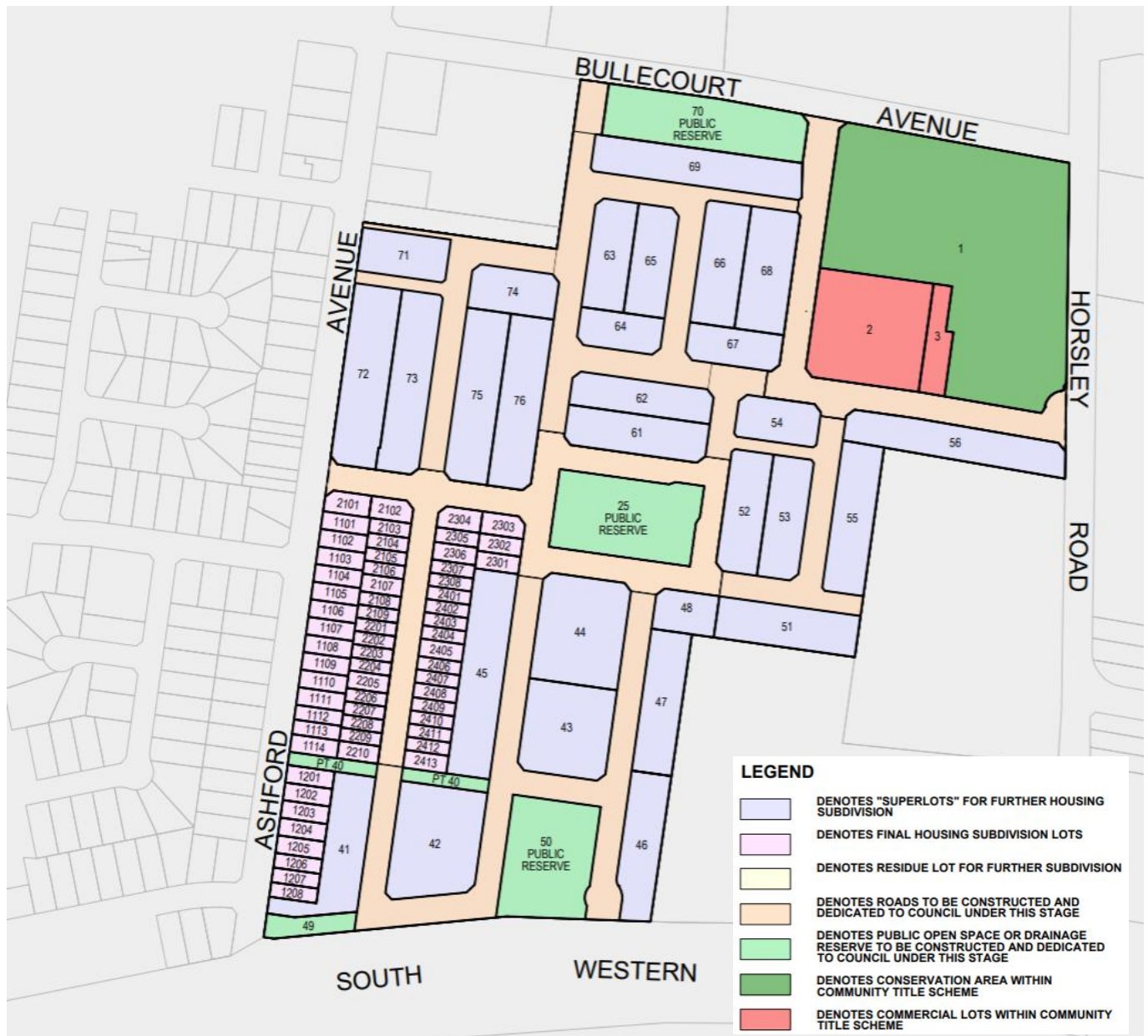


Figure 14 General Arrangement Plan

Source: Beveridge Williams

4.3 Residential Development

The proposed development comprises the delivery of 62 dwelling houses on the 62 residential lots, which will be delivered under Stages 1 (22 dwellings) and 2 (40 dwellings). The proposed dwellings are a mixture of 3- and 4-bedroom 2-storey dwelling houses, with either a single or double garage. An extract sample of the front elevations of the proposed dwelling houses are shown at **Figure 15**.

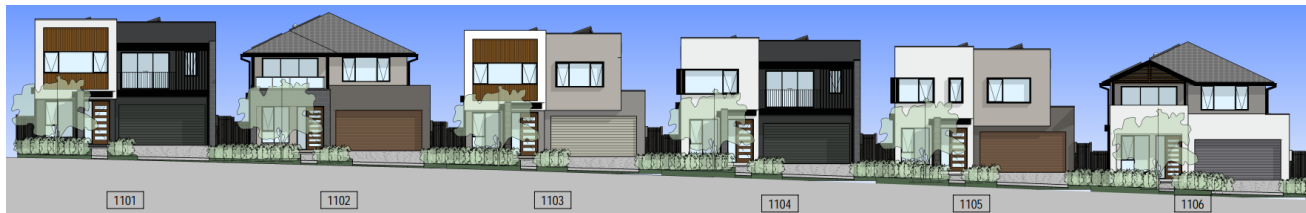


Figure 15 Sample Extract of the Proposed Residential Dwellings

Source: Mirvac Design

The plans for each individual dwelling are located at **Appendix GG**.

4.4 Non-Residential Development

The existing childcare centre is located within the disused school building within the E1 Local Centre zoned land and is currently not operating. The existing childcare centre has an approved capacity of 67 children and is to become operational following the completion of the surrounding Stage 3a works. The childcare centre will operate in accordance with the existing consent DA-752/2011.

No modifications to the existing childcare centre building are proposed under this SSDA. Works relating to the childcare centre are limited to the realignment of internal roads around the existing building and the construction of a new car park with 17 spaces, which will support both the childcare centre and future uses within the E1 Local Centre zoned portion of the site.

4.5 Public Domain and Landscaping Works

The proposed development comprises three areas which will be utilised for public parks to be dedicated to the Council, known as the Northern, Central and Southern Parks (refer **Figure 16**).



Figure 16 Landscape Concept for the Northern, Central and Southern Park

Source: Urbis

The landscape design for these new public parks include:

- Circulation pathways
- Native plantings
- Various outdoor recreation spaces, including fitness zones, an amphitheatre lawn, open turfed areas and multi-purpose sports courts
- Seating and other soft infrastructure, and
- Car parking and bike racks.

4.6 Site Access

Vehicular access points to the site will be located on Bullecourt Avenue, Horsely Road and Ashford Avenue as shown in the below **Figure 17**.



Figure 17 Proposed Access Arrangements on Bullecourt Avenue, Horsely Road and Ashford Avenue

Source: Beveridge Williams

As part of the proposed development, the existing site access on Bullecourt Avenue will be modified; however, vehicle movements will remain consistent with the current arrangement, permitting left-out only movements. The existing right-turn lane and painted median on Bullecourt Avenue will remain unchanged. The existing separated driveway off Bullecourt Avenue will be modified to a two-way access road (Road 9) with kerb return on either side to align with the kerb line on Bullecourt Avenue. The proposed access road will form a T-intersection with Bullecourt Avenue.

The existing roundabout on Horsley Road will be retained and will continue to function as a traffic-calming measure. A new intersection arrangement is proposed that will facilitate left-in and left-out movements into the site from Horsley Road. Kerb extensions are proposed to the south of the intersection to allow for safer pedestrian crossing across Horsely Road.

A new access road is also proposed at the location of the existing driveway on Ashford Avenue. Kerb extensions are proposed on Ashford Avenue north of Zonnebeke Crescent (outside No.148-150) to support the new driveway access onto Ashford Avenue.

Internal roads, laneways, and intersection designs within the residential subdivision are also proposed to generally adhere to the Council's requirements, and in summary will include:

- 18m wide road reserves with a 11m wide carriageway (local road).
- 17.2m wide road reserves with a 10.2m wide carriageway (minor local road).
- 18.7m wide road reserves with a 10.2m carriageway (minor local road).
- 21.6m wide road reserves with a 10.2m carriageway (minor local road).
- 21.5m road reserves with 3.5m road reserves and a ~2.5m landscaped median (local road).
- 9m wide pedestrian laneways with vegetated verges.
- Raised pedestrian crossings.
- In pavement street trees are proposed within the on-street parking bays to maximize the quantum of trees and canopy cover located over roads and footpaths.
- Landscape blisters are proposed on road and intersection corners.

4.7 Earthworks

Given the scale of the site and the previous use for non-residential purposes, cut and fill will be required to support the delivery of the intended masterplan across the site. Preliminary modelling indicates that approximately 5,000m³ of fill material will be required to align levels across the site to deliver the intended masterplan.

The roads and residential land levels are required to be located above the flood planning level (FPL) which is typically 0.5m above the 1% AEP Flood level of the Georges River which has a level of RL5.55. As such, the roads and residential lots adjoining the M5 motorway southern boundary are proposed to be filled up to 3.5m above the existing levels.

The proposed road grading has been designed to generally align with the existing topography of the site. The design intention of the lot grading is to provide uniform fall across the development with grades varying from 1% to 3%. This is achieved by incorporating retaining walls which are proposed along the internal lot boundaries where required as well as along the adjoining common boundaries along neighbouring properties. The maximum height of a proposed retaining wall within residential lots is 1.5m.

Retaining walls are also proposed along the boundary of the site with the adjacent M5 motorway and the Mount St Joseph's High School. The maximum height of the proposed retaining wall along the boundary with Mount St Joseph's High School is 2.4m.

4.8 Infrastructure and Services

4.8.1 Services and Utilities

As the site was previously used as a university campus, the site is serviced by existing utilities including sewer lines, potable water lines, electrical services, telecommunications utilities and internal stormwater drainage. The proposed development includes required augmentation of these services and utilities including notably:

- Existing overhead Ausgrid electrical and NBN/Telstra communication cables in Ashford Avenue will be augmented and new NBN pit and pipe will be installed underground, to service each new residence along Ashford Avenue.
- Reticulation of new electrical services throughout the site including streetlights, pillars and substations will occur on a stage-by-stage basis.
- Electrical substations are proposed within the open space and the E1 Local Centre zoned land adjoining Road No. 9, and in a residential lot in the northern portion of Ashford Avenue.
- New watermain reticulation will occur on a stage-by-stage basis as required.
- New sewer mains will be reticulated throughout the site and connect to the adjusted main along the southern boundary of the site. Each new lot will have a house service connection to the new sewer main. The sewer will be the deepest service when crossing other services.
- No gas is proposed to be installed within the residential development.

4.8.2 Erosion and Sediment Control

As the site has recently completed demolition works (DA 1512/2023), erosion and sediment controls have been installed throughout the site as approved by the Council. Erosion and sediment controls will be constructed in line with the Soil and Water Management Plan and details, Canterbury-Bankstown Council's requirements, and Landcom's "Blue Book" - Managing Urban Stormwater: Soils and Construction, including for example the following works during the construction of the development:

- Installation of sediment fencing as required.
- Installation of silt arrestors to collect site runoff and retain suspended particles.
- Construction of sediment basis and diversion swales to divert upstream clean water around the construction zone and divert dirty water into the sediment basis.

In addition to works proposed within the construction phase, the following erosion and sediment civil infrastructure works are proposed across the site:

- Stage 1 and 2 – The existing sediment basin used for the construction phase will be converted into a temporary rain garden at the delivery of Stages 1 and 2 civil works.
- Stage 4 – The existing basin will be filled and decommissioned and replaced by proposed basins 1 and 2. These two basins will remain in place until the end of construction works or prior to 80% of housing construction being completed for each catchment, at which time the basins will be converted to permanent detention/bioretention basins.

- Stages 3, 6 and 7 – The Stage 3 temporary sediment basin will be converted to a temporary rain garden at the delivery of the Stage 3 civil works until the commencement of the Stage 6 works, when the basin will be filled and decommissioned.

4.9 Site Preparation Works

To facilitate the proposed development and execute the commitments of the VPA, 358 trees are proposed to be removed from the site. It is noteworthy that the proposal includes the planting of 605 new trees to be planted as street trees and within open spaces. Additionally, the overall project has sought to avoid and minimise direct impacts on native vegetation and habitat by:

- Avoiding good-quality, intact native vegetation Cumberland Plain Woodland in the conservation area;
- Amendments to the overall project design and layout to maximise the retention of native trees;
- Amendments to the intersection between Road 2 and Horsley Road to reduce the impact on the conservation area;
- Locating any temporary or ancillary construction facilities to avoid additional clearing of vegetation;
- Redesigning the drainage line as a 1.5m pipe rather than a 4m batter to reduce the impact to existing trees;
- Incorporating a detailed landscape design as part of the project, that will utilise species of Cumberland Plain Woodland, from seeds that have been collected and propagated from within the study area;
- A Vegetation Management Plan (VMP) will be prepared and implemented for the ongoing management, restoration and enhancement of retained Cumberland Plain Woodland within the C2 Environmental Conservation zoned land; and
- Minimising impacts to biodiversity through the implementation of a suite of mitigation measures including sediment control, tree protection measures, nest box installation and clearing protocols such as pre-clearance and ecological clearance supervision.

All trees proposed to be removed will be removed in Stage 1 alongside site remediation works required due to the contamination of the site. The remediation strategies required to be utilised are outlined in the Remediation Action Plan (RAP) prepared by EGA (refer **Appendix Y**).

4.10 Conservation Area

The conservation area is intended to be preserved in accordance with the original Planning Proposal and requirements of the VPA. No vegetation is proposed to be removed from the Cumberland Plain Woodland that is located within the C2 Environmental Conservation zoned land, and the area will be fenced to ensure its appropriate conservation. Refer to **Section 7.10** for further details on the community title lots and how they contribute to the ongoing management of the C2 zoned land.

5.0 Statutory Context

This section provides an assessment of the matters the consent authority must consider when determining a development application under Section 4.15(1) of the EP&A Act.

5.1 Power to Grant Approval

Table 5 identifies the legal pathway under which consent for the project is sought, its permissibility and any other approvals that are required to carry out the project.

Table 5 Power to grant approval

Consideration	Assessment
Declaration of SSD	The development is declared SSD pursuant to State Significant Development Declaration Order 2025 (No 13) Part 2, Section (4)(1)(j).
Consent authority	Pursuant to Section 4.5(a) of the EP&A Act, the Minister for Planning and Public Spaces, or their delegate will be the consent authority for the SSDA.

5.2 Permissibility

The proposed development is entirely permissible with consent, as detailed in **Table 6** below.

Table 6 Permissibility of the proposed development

Consideration	Assessment
Zoning	The site is zoned as part R1 General Residential, part E1 Local Centre, part RE1 Public Recreation, part C2 Environmental Conservation, and part SP2 Infrastructure.
Proposed uses	The proposed development includes the following uses: • Dwelling houses • Centre based childcare facility • Recreation area • Drainage works • Roads
Permissibility	All proposed land uses are permitted with consent in the relevant zone, including: • The proposed dwelling houses are permitted with consent in the R1 General Residential zone. • The existing 'Centre based childcare facilities' (childcare centre) and associated proposed car park are permitted with consent in the E1 Local Centre zone. • 'Recreation areas' are permitted with consent in the RE1 Public Recreation zone. • Drainage works are permitted with consent in the SP2 Infrastructure zone. • Roads are permitted within the C2 Environmental Conservation zone and R1 General Residential zone.

5.3 Other Approvals

Table 7 outlines other approvals that are required to carry out the proposed development under Division 4.7 of the EP&A Act.

Table 7 Other approvals

Consideration	Assessment	
Approvals not required for SSDA	Act	Authorisation Otherwise Required?
Section 4.41 of the Act stipulates certain authorisation that do not apply to SSD	Fisheries Management Act 1994 - Section 201, 205 or 219	No
	Heritage Act 1977 - Section 139	No
	National Parks and Wildlife Act 1974 - Section 90	No
	Rural Fires Act 1997 - Section 100B	Yes
	Water Management Act 2000 - Section 89, 90 or 91	No
Consistent Approvals	Act	Authorisation Required?
Section 4.42 of the EP&A Act stipulates	Fisheries Management Act 1994 - Section 144	No
	Coal Mine Subsidence Compensation Act 2017 - Section 22	No

Consideration	Assessment	
certain authorisations that must be applied consistently but cannot be refused if they are necessary for carrying out an approved SSD	Mining Act 1992 – Mining lease	No
	Petroleum (Onshore) Act 1991 – Production lease	No
	Protection of the Environment Operations Act 1997 – An environment protection licence under Chapter 3	No
	Roads Act 1993 – Section 138	Yes
	Pipelines Act 1967 – a licence	No
EPBC Act Approval		
<i>Environmental Protection and Biodiversity Conservation Act 1999</i>	The <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) is a federal legislation with an aim to protect and manage significant flora, fauna, ecological communities and heritage places that are identified as Matters of National Environmental Significance (MNES). If the proposed development results in any impacts to any MNES, it must be referred to the Federal Department of the Climate Change, Energy, the Environment and Water (DCCEE) to undertake an assessment to determine whether the development is a 'controlled action', which would then require an approval under the EPBC Act. A Biodiversity Development Assessment Report (BDAR) which has been completed by SLR Consulting for the whole site (refer Appendix K) concludes that the proposed removal will not result in fragmentation or disconnection of habitat corridors. While a small reduction in habitat area will occur, existing habitat connectivity will be preserved in the short term and enhanced over time through the retention of vegetation within the site and through additional plantings outlined in the Landscape Plan (refer Appendix H). As outlined in the 'Self-assessment' section of the EPBC Act Business Portal, the Protected Matters Search Tool (PMST) is to be utilised to generate a report of potential MNES that may occur in the vicinity of a proposed action. Any potential MNES that may be impacted by the proposed action are to be assessed against the relevant Significant Impact Guidelines. A Self-Assessment has been carried out by SLR Consulting for the proposed development (refer Appendix J). The results of this self-assessment have determined that the proposed action does not result in a significant impact on any MNES and therefore a referral to the Commonwealth is not required.	

5.3.1 Pre-Conditions to Exercising the Power to Grant Consent

Table 8 identifies any pre-conditions for the consent authority in exercising their power to grant approval for the project.

Table 8 Pre-conditions for the consent authority

Statutory Reference	Assessment
Biodiversity Conservation Act 2016	Section 7.9(2) of the <i>Biodiversity and Conservation Act 2016</i> (BC Act) requires that an SSD application be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environmental Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. As noted above, a BDAR has been prepared which has concluded that the proposed vegetation removal and plantings will not result in any adverse biodiversity impacts.
State Environmental Planning Policy (Transport and Infrastructure) 2021	The site has frontages to two classified roads (Bullecourt Avenue and Horsley Road), and subsequently the consent authority is required to consider Section 2.119 Development with a frontage to a classified road. In considering this clause, the consent authority must ensure that development on land fronting a classified road does not compromise road safety or function. Specifically, consent cannot be granted unless the authority is satisfied that, where practicable and safe, vehicular access is provided via an alternative road. Additionally, the development must not negatively impact the safety, efficiency, or ongoing operation of the classified road due to the design of the access point, emissions such as smoke or dust, or the type, volume, or frequency of vehicles using the classified road for access. The development is classified as a 'traffic-generating development' under Section 2.122 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP), as it proposes more than 50 allotments on the site and has direct access to two classified roads. As such, this SSDA must be referred to Transport for NSW (TfNSW) for comments. Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network. This SSDA will be referred to the electricity supply authority for comments.
State Environmental Planning Policy	Chapter 4 of the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards 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

Statutory Reference	Assessment
(Resilience and Hazards) 2021	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. Category 2 Remediation works are proposed to occur separately on the site, however development consent is being sought for all remaining Category 1 remediation works under this SSDA. A comprehensive Detailed Site Investigation (refer Appendix X), Remediation Action Plan (refer Appendix Y), Site Auditor's Report and Site Auditor's Statement (refer Appendix Z) demonstrate that the site can be made suitable for the proposed land uses.

5.3.2 Mandatory Matters for Consideration

Table 9 provides an assessment of the mandatory matters the consent authority is required to consider in deciding whether to grant approval for the project. A Statutory Compliance Table is provided at **Appendix B**.

Table 9 Summary of Mandatory Matters for Consideration

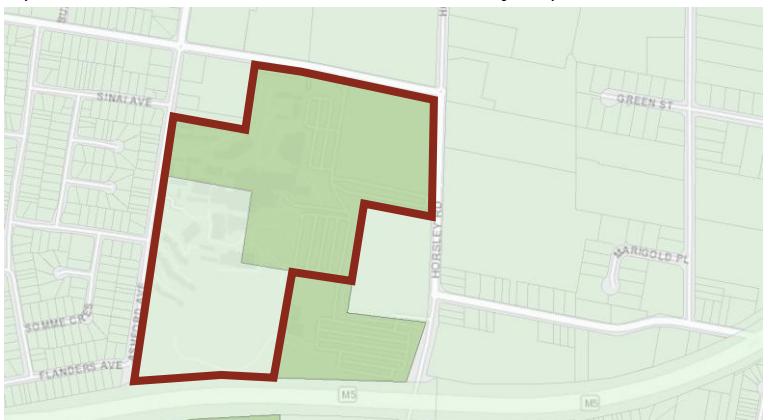
Plan	Comments
Environmental Planning & Assessment Act 1979	The development is consistent with the objects of the EP&A Act for the following reasons: • The proposal will promote and facilitate housing supply and diversity. • ESD has been considered throughout the design of the building, integrating relevant economic, environmental and social considerations into the design to promote sustainable development. • A BDAR has been prepared which assesses the potential impacts to biodiversity present on the site, and has concluded that the proposed removal will not result in fragmentation or disconnection of habitat corridors, and that existing habitat connectivity will be preserved in the short term and enhanced over time through the retention and addition of vegetation. • Community and stakeholder engagement has been undertaken by the Project Team in preparation of the SSDA, as detailed in Section 6.0 of the EIS. Through the assessment period, there will be another opportunity for community and stakeholders to respond to the proposed development. The Applicant will respond to any concerns raised during the notification of the SSDA. The proposed development is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • The development has been declared to be State Significant development; and • It has been evaluated and assessed against the relevant matters for consideration under Section 4.15(1), as outlined below: - (a)(i) any environmental planning instrument: Section 0 - (a)(iii) any development control plan: Appendix D - (a)(iii) any planning agreement that has been entered into under section 7.4 ...: Section 3.3 • (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: Section 7.0 • (c) the suitability of the site for the development: Section 8.8 • (e) the public interest: Section 0
State Environmental Planning Policy (Sustainable Buildings) 2022	The <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> (Sustainable Buildings SEPP) was adopted as part of the NSW Government's commitment to delivering sustainable and resilient buildings, to contribute to the target for net zero emissions by 2050. BASIX Certificates for the proposed 62 residential dwellings are located at Appendix N.
Canterbury Bankstown LEP 2023	An assessment of the proposed development against the provisions of the Canterbury Bankstown LEP 2023 is provided within Section 0.
Canterbury Bankstown DCP 2023	It is noted that development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Section 2.10 of the Planning Systems SEPP, which states that '<i>Development Control Plans...do not apply to... State Significant Development</i>.' Notwithstanding, given the site's history in being recently rezoned and subject to a site-specific DCP, an assessment has been carried out against the relevant controls of the DCP (refer Appendix D).
Canterbury Bankstown Local Infrastructure Contributions Plan 2022	A Section 7.11 Contribution for the proposed 62 residential lots will be made. Importantly, these contributions (and those within the future SSDA 2) will be partially offset by the contributions made under the VPA (refer Section 3.3). Housing and Productivity Contributions will also be payable to the State Government for the development.

5.3.3 Relevant Local Environmental Plan

An assessment against the relevant clauses of the Canterbury Bankstown LEP 2023 is provided in **Table 10**.

Table 10 Assessment against Canterbury Bankstown LEP 2023

Clause	Standard	Assessment
Clause 2.3 Zone Objectives and Land Use Table	The site is zoned as: • R1 General Residential • E1 Local Centre • RE1 Public Recreation • C2 Environmental Conservation • SP2 Infrastructure	All proposed land uses are permitted with consent in the relevant zone, including: • The proposed dwelling houses are permitted with consent in the R1 General Residential zone. • The existing 'Centre based child care facilities' (childcare centre) and associated proposed car park are permitted with consent in the E1 Local Centre zone. • 'Recreation areas' are permitted with consent in the RE1 Public Recreation zone. • Drainage works are permitted with consent in the SP2 Infrastructure zone. • Roads are permitted with consent in the C2 Environmental Conservation zone and R1 General Residential zone.
Clause 4.1 Minimum Subdivision Lot Size	A minimum lot size of 300m ² applies for the portion of the site zoned R1 General Residential.	The proposed residential lots fronting Ashford Avenue comply with this minimum lot area, although clause 4.1B overrides this clause in the case of any inconsistency. The proposed residential lots not fronting Ashford Avenue comply with the requirements of clause 4.1B.
Clause 4.1B Minimum Lot Sizes and Special Provisions for Certain Dwellings	Development consent must not be granted for semi-detached dwellings on the site unless each lot is a minimum 210m ² .	No semi-detached dwellings are proposed as part of this SSDA. Future stages of residential subdivision and construction of dwellings may comprise semi-detached dwellings, and the proposed super lots have been designed to accommodate these minimum lot requirements.
	Development consent must not be granted for attached dwellings on the site unless each lot is a minimum 140m ² .	No attached dwellings are proposed as part of this SSDA. Future stages of residential subdivision and construction of dwellings may comprise attached dwellings, and the proposed super lots have been designed to accommodate these minimum lot requirements.
	Development consent must not be granted for dwelling houses adjoining Ashford Avenue, Milperra on the site unless each lot is a minimum 300m ² .	The proposed residential lots fronting Ashford Avenue (within Stage 1, plus one lot in Stage 2) comply with this minimum lot area.
	Development consent must not be granted for dwelling houses on the site (other than those fronting Ashford Avenue) unless each lot is a minimum 245m ² .	The proposed residential lots that do not front Ashford Avenue (within Stage 2) comply with this minimum lot area. Further, the super lots proposed for the remainder of the development have been designed to accommodate residential lots that meet this requirement.
Clause 4.3 Height of Buildings	The site is subject to the following height controls: • No limit on the portion of the site zoned RE1 • 9m for majority of the site zoned R1 • 11m for E1 zoned portion of the site and the northern strip of R1 zoned land	The majority of the R1 General Residential zoned land has a maximum 9m height of building development standard. The proposed dwellings range from ~6.97m to ~7.64m, thereby complying with the development standard. No works are proposed within this SSDA within the E1 Local Centre zoned land that will increase the height of existing buildings, or propose any building greater than 11m in height.
Clause 4.4 Floor Space Ratio	The site is subject to the following FSR controls: • The majority of the site has no FSR limit. • A small area of land on the northern portion of the site is subject to a 1.4:1 FSR development standard. • The E1 Local Centre zoned land comprises a 1:1 FSR development standard. • Certain land and along Ashford Avenue is subject to a maximum 0.5:1 FSR development standard.	The residential lots in Stage 1 are proposed to have an FSR between 0.459:1 to 0.495:1, thereby complying with the development standard.

Clause	Standard	Assessment
Clause 5.1A Development on land intended to be acquired for public purposes	The land zoned SP2 Infrastructure on the site is to be acquired by the Council for drainage. The land zoned RE1 Public Recreation is to be acquired by the Council for local open space	Land on the site that is zoned RE1 and SP2 will be dedicated to the Council as required by the executed VPA.
Clause 5.10 Heritage	The site is not listed as a heritage item and is not located within a heritage conservation area. Notwithstanding, the site is located adjoining Ashford Avenue and Bullecourt Avenue which are listed as a heritage item I218 Milperra Soldier Settlement (former). A Statement of Heritage Impact (SOHI) prepared by Extent Heritage at Appendix R has concluded that the proposed development does not pose any adverse impacts upon the significance of these items. This is further discussed in Section 7.7 . As Council have also requested a Heritage Interpretation Strategy be submitted with this SSDA (refer Appendix S).	
Clause 5.21 Flood Planning	Portions of the site are affected by the 1 in 100 year storm event (100-year AEP). A FIA has been prepared by Beveridge Williams at Appendix EE which has informed the design of the proposed development, including stormwater design to ensure surrounding development is not adversely impacted.	
Clause 6.1 Acid Sulfate Soils	The site is identified as containing class 5 acid sulfate soils. The DSI prepared by EGA (refer Appendix X) states that a review of the acid sulfate soil risk mapping layer accessed on the Environment NSW 'eSpade V2.1' web application (accessed 10 January 2024), indicated that the site lies in an area mapped as 'No Known Occurrence' with respect to acid sulfate soils. This infers that land management activities are not likely to be affected by acid sulfate soil materials. Further assessment of acid sulfate soils in the context of this investigation is considered by EGA as not warranted.	
Clause 6.2 Earthworks	Before granting development consent for earthworks, the consent authority must consider the effect of the development on the likely future use or redevelopment of the land and the effect of the development on the existing and likely amenity of adjoining properties. The proposal includes excavation works and construction of various retaining walls to mitigate the impacts of topography across the site and to protect the amenity of adjoining properties. This SSDA is accompanied by Section Plans (refer Appendix CC), Civil Plans (refer Appendix CC), and a Stormwater Management Plan (refer Appendix CC) which illustrate the extent of earthworks proposed.	
Clause 6.4 Biodiversity	A portion of the site is identified on the biodiversity map as outlined below.  Figure 18 Biodiversity Mapping of the site Source: Canterbury Bankstown Council <i>Development consent must not be granted on the land identified above unless the consent authority is satisfied that—</i> <i>(a) the development is designed, sited and will be managed to avoid a significant adverse environmental impact, or</i> <i>(b) if a significant adverse environmental impact cannot be reasonably avoided by adopting feasible alternatives—the development is designed, sited and will be managed to minimise the impact.</i> A Biodiversity Development Assessment Report (BDAR) which has been completed by SLR Consulting for the whole site (refer Appendix K) concludes that the proposed removal will not result in fragmentation or disconnection of habitat corridors. While a small reduction in habitat area will occur, existing habitat connectivity will be preserved in the short term and enhanced over time through the retention of vegetation within the site and through additional plantings outlined in the Landscape Plan (refer Appendix H).	
Clause 6.9 Essential services	<i>Development consent must not be granted to development unless the consent authority is satisfied that the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required—</i>	Given the site's former use as a university campus, the site is serviced by all required infrastructure. Augmentation of existing services is proposed to support the subdivision.

Clause	Standard	Assessment
	(b) the supply of electricity, (c) the disposal and management of sewage, (d) stormwater drainage or on-site conservation, (e) waste management, (f) suitable vehicular access.	
Clause 6.13 Special provisions for centre-based child care facilities	Development consent must not be granted for centre-based child care facilities if the vehicular access to the land is from— (a) a classified road, or (b) a cul-de-sac road or a road where the carriageway between kerbs is less than 10m.	The access to a childcare centre cannot be from a cul-de-sac (a road that terminates). The existing childcare centre which is proposed to be altered as part of this SSDA will be accessed via a new local road running along the southern and western boundaries of the E1 Local Centre zoned land, both of which have a carriageway with a width greater than 10m. This road connects to both Bullecourt Avenue and Horsley Road. The existing childcare will not be operational without access to this new road to be delivered in Stage 3A (and the applicant will accept a condition to this effect).
Clause 6.15 Design Excellence	If the development involves multi dwelling housing of 10 or more dwellings and/or the childcare facility will be used for at least 100 children at one time, development consent must not be granted unless the consent authority is satisfied the development exhibits design excellence.	The proposed development does not include any multi-dwelling houses, or the expansion of the childcare facility. As such this clause does not apply to this SSDA.
Clause 6.21 Restrictions on Development in Zones E1 and E3	Development consent must not be granted on the portion of the site zoned E1 Local Centre unless the consent authority is satisfied that the ground level of a building resulting from the development will not be used for residential accommodation.	No ground level residential accommodation is proposed within the E1 Local Centre zone.
Clause 6.34 Development at 2 and 2A Bullecourt Avenue, Milperra	Development consent must not be granted to more than 430 dwellings on the land.	The proposed development comprises the delivery of 62 dwelling houses, however, will accommodate an anticipated maximum 430 dwellings total when the future superlots are eventually subdivided.
	Development consent must not be granted for dual occupancies unless— (a) the lot is at least 350m ² , and (b) 1 of the dwellings will have a GFA not exceeding 75m ² .	No dual occupancies are proposed as part of this SSDA.
	Development consent must not be granted multi dwelling housing unless— (a) the lot is at least 1,000m ² , or (b) the lot is at least 450m ² and the following apply— (i) 1 of the dwellings will have a GFA not exceeding 75m ² , (ii) the development will result in no more than 3 dwellings.	No multi dwelling houses are proposed as part of this SSDA.
	A single development consent may be granted to development on land to which this clause applies, other than land adjoining Ashford Avenue, Milperra, if the DA is for both of the following— (a) the subdivision of land into 4 or more lots, including 1 or more that may be less than the minimum size shown on the Lot Size Map, (b) the erection of residential accommodation on each resulting lot.	No variations are proposed to the minimum lot size shown on the Lot Size Map for land adjoining Ashford Avenue, Milperra. This clause allows for the determination of this SSDA which includes both the construction of certain dwellings and the subdivision of 4 or more lots, including 1 or more that is less than 300m ² in accordance with clause 4.1B on land that does not front Ashford Avenue (within Stage 2).
	The majority of the site is identified as "Area 6". Development consent must not be granted to development in "Area 6" unless the consent authority is satisfied the GFA of all buildings on the lot will not exceed 37% of the lot size plus 80m ² .	This development standard does not apply to the construction of dwellings fronting Ashford Avenue (Stage 1 and one lot in Stage 2). The dwellings in Stage 2 of the proposed development comply with this requirement.
	Clause 4.1B prevails over this clause to the extent of an inconsistency	N/A

Clause	Standard	Assessment
Clause 6.44 Development in local centres	Development consent must not be granted to development on the portion of the site zoned E1 Local Centre unless the consent authority has considered— (a) the impact of the development on— (i) the amenity of surrounding residential areas, and (ii) the desired future character of the local centre, and (b) whether the development is consistent with the hierarchy of centres.	The proposed works on the E1 Local Centre zone are limited to the construction of a new car park with a maximum 17 spaces, to replace the carparking spaces currently available on the land that will be a future road. It is intended that the car park will service the childcare centre and support future development on the E1 Local Centre zoned land. It is commonplace for the co-location of childcare centres with residential zoned land. The car park will also be separated from adjacent residential zoned land by a road reserve and E1 zoned land. As such the new car park is not anticipated to adversely impact upon the amenity of the surrounding residential areas. Given no increase in retail area is proposed in the E1 Local Centre zone, the proposed development will not impact the existing hierarchy of centres within the LGA.

6.0 Stakeholder Engagement

Preliminary stakeholder engagement has been undertaken for the project in accordance with the project SEARs and the principles of the *Department's Undertaking Engagement Guidelines for State Significant Development*, including being proportionate to its scale and likely level of community interest.

This chapter provides a summary of the engagement undertaken, initial feedback received and how the development responds to this. Ongoing engagement with the community and other stakeholders will also be carried out through the assessment of the SSDA. An Engagement Report has been prepared by Mirvac and is provided at **Appendix B**.

6.1 Pre-Lodgement Engagement Undertaken

6.1.1 Identified Stakeholders for Engagement

The following key stakeholder groups were identified as potentially having an interest in the proposal:

- The Department of Planning, Housing and Infrastructure
- Environmental Protection Agency
- Sydney Water
- Transport for NSW
- Ausgrid
- Telstra
- Environment and Heritage
- Canterbury Bankstown Council
- Gandangara Local Aboriginal Land Council
- Canterbury Bankstown Council CEO
- Federal Member for Blaxland, Minister for Education (Jason Clare MP)
- State Member for East Hills (Kylie Wilkinson MP)
- Neighbouring residents
- Nearby businesses
- Mount St Joseph's Catholic School
- Wider neighbourhood
- Broader community
- Community groups and services

6.1.2 Engagement Methodology

Various methods for consultation and engagement have been used to engage with the abovementioned stakeholders. These methods are summarised in **Table 11**.

Table 11 Summary of engagement methodology

Activity	Group	Purpose
Project notification letter	Immediate neighbours, wider community, registered project database	To ensure stakeholders were aware of the next phase of planning, with opportunities to learn more, ask questions, and stay informed – building on feedback and relationships established through earlier consultation.
Key local stakeholder emails	Local stakeholders (neighbouring school, ESR site, Bankstown Bushland society)	To ensure that key local stakeholders were made aware of the project's next planning phase and had the opportunity meet.
Key local government letters	Council CEO, State and Federal MPs	To ensure the local community representatives were kept informed of project updates in their area and had access to accurate information and contact details to respond to constituent enquiries if required.
Community webinar	Local residents and businesses	Provides visual aids to stakeholders and the community during engagement events and ensured that meaningful feedback could be obtained.

Activity	Group	Purpose
Project website	All	Provides key information about the project during engagement and an opportunity for community and stakeholders to stay up to date throughout the project lifecycle.
Meetings	Mt St Josephs Catholic College, Canterbury Bankstown Council Planners	Engagement supported coordination with the adjoining landowner, helping to establish clear communication channels, identify potential collaboration opportunities, and ensure alignment on timing and interface management during project delivery. Workshops and follow-up meetings provided an opportunity to respond to Council feedback on previous submissions, review technical matters such as water management, biodiversity, and public domain treatments. Pre-lodgement discussions focused on ensuring a shared understanding of project objectives, design intent, and documentation requirements ahead of the next stage of submission.

6.2 Preliminary Feedback and Responses

6.2.1 Canterbury-Bankstown Council

Following the withdrawal of the DAs outlined in **Section 1.5.2**, the applicant and their consultant team engaged with Council staff to inform the preparation of a consolidated DA which will seek development consent for the comprehensive redevelopment of the site (which now forms the works proposed in this SSDA). A pre-DA meeting for this DA was carried out on 05 September 2025. Responses to the key comments raised by Council are shown in **Table 12**.

Table 12 Response to Council Comments

Matter	Council Comment
Design Development Meeting - 9 September 2024	• Council confirmed in-principle agreement to the use of 'roll kerb' within the development. An example of where roll kerb would not be ideal is fronting Open Space areas. • Council confirmed in-principle agreement to the proposed intersection blister concepts proposed by Mirvac. Council's preference would be to not continue a 'straight-through' gutter between the blister and kerb, if not a technical requirement due to maintenance considerations. • Council confirmed in-principle agreement to the use of concrete edge strip paired with one-way crossfall roads (particularly around open space areas) in addition to on-grade entry thresholds / traffic calming measures in order to delineate parking lanes. • Council confirmed in-principle agreement to the proposed stormwater basin staging and Water Cycle Management Plan (WCMP) for WSU Milperra. • Council confirmed in-principle agreement to the proposed tiered step landscape concept for use in the development – on the basis the landscape design allows for access of a ride-on lawnmower for the purpose of maintenance. • Council confirmed in-principle agreement to provide a concession to the DCP 75% porous and cool pavements requirement in Part 4.7, C3 and C4 of the DCP on the basis of achieving the same objectives being: - Strata cell (or equivalent) for planted trees within the road reserve. - Demonstrate canopy cover of planted trees within the road reserve, at time of planting and future maturity (incl. timeline when achieved). - Demonstrate minimalistic approach to hard surfaces/ pavement within the road reserve.
Meeting with Council – 11 February 2025	• The construction of the stormwater basin within the northern open space fronting Bullecourt Avenue would require the removal of a significant number of trees. As such, alternative options will be explored including providing a filter tank within the car parking area, or providing a smaller bio basin in conjunction with a filter tank within the car parking area.
DA Workshop – 18 June 2025	• Flooding – The Applicant noted the 2023 Flood Study completed by JWP as part of the rezoning references the information in the 2004 Flood Study by Bewsher Consulting and adopts a more conservative Flood Planning Level (FPL). Council agreed that the Applicant can adopt the 2023 Flood Study with specific reference to the 2004 Flood Study and SSR within the certification letter. • Flooding – Council raises no issues with on-site overland flow or compensatory storage – however additional information / sensitivity assessment of impacts to existing properties along Ashford Avenue and Flanders Avenue needs to be included in the documentation, with the subject properties shown in plan view within the documents. This is to be provided through a 2D/TUFLOW Model. Council also noted to ensure reporting uses latest standards and rainfall data. (See below further update on flood modelling requirements).

Matter	Council Comment
	• Biodiversity – Council confirmed that they would not accept a staged approach to Biodiversity Assessment, which did not consider a Masterplan BDAR. As such, a site-wide BDAR has been prepared and is attached to this Pre-DA Meeting Request and will accompany the future DA. • Biodiversity – Council noted that previously submitted Ecological and Biodiversity documents did not provide enough detail in relation to existing groundcover species; notably Couch Grass not being recognised as native although it is listed in the NSW database as considered native. Despite the fact that Cumberland Ecology regard <i>Cynodon dactylon</i> (Couch) as an exotic species, at the request of Council, it has been assessed as a native species throughout the BDAR, and kept as a native species in the BAM-Calculator (BAM-C). • Childcare – Council advised if the Applicant were to include roads adjacent to the childcare centre within a staged civil works DA, the Applicant will need to surrender the existing childcare DA if a carpark was not created as part of the civil works DA. In response, both the construction of the new roads fronting the childcare centre (Road 9 and Road 2B – with a minimum carriageway of 10m) and a new carpark to support the childcare centre is within the scope of this current DA the subject of this Pre-DA Meeting Request. • Vegetation Management Plan (VMP) – Council advised that as the DCP anticipates a single DA over the site, it is their expectation that a VMP for the C2 zoned land will be submitted with the DA. As such, a VMP will be submitted with the current DA the subject of this Pre-DA Meeting Request.
Email from Council – dated 9 July 2025 noting no Flood Study required	• An updated Stormwater System Report (SSR) was provided by the Council which supersedes the original report and any associated comments that were raised as a result of the original SSR. The revised SSR advised that no flood report is required. Council have reviewed their flood modelling data and have confirmed there is no continuous flows through the site and all water generated is internal, therefore the subject site cannot be classified as a floodway and no further flood study is required. A Flood Risk Management Assessment Report will be prepared to support the DA.
Pre-SSDA Lodgement Meeting – 31 October 2025	• Greater clarification around the Community Title Scheme was provided. Council acknowledged the rationale behind the proposal and requested this be outlined in this EIS – please refer to Section 7.10 for further detail. • Council requested the proponent justify the location of the substations and RE1 zoned land dedication to meet the VPA commitments. It was noted that when Council raised this comment, they had not seen the updated Civil Plans. The proponent clarified that the positions of the substations were determined by factors including: - The DCP requires provisions for EV Charging infrastructure throughout the subdivision, notably within the public open space, with some parks being allocated multiple charging provisions. - It is best practice in electrical design to locate the substation as close as possible to the load centre in order to reduce the require cable size and voltage drop. - Additionally, the largest supply you can get off a standard Ausgrid pillar is 400V at 200A (80kVA) which would allow for a maximum of one charger with minimal capacity for future increase of the charger size. The installation of more than one charger would require either a direct distributor or a dedicated substation to support the charger. As the subdivision works are for provision for EV charging only, having the substation as close as possible to the future location leaves the most flexibility for future install and increases in EV charging capacity. • Clarification of the shared pathway width was also provided. Council acknowledged that the width was derived from the site-specific DCP, however noted that their preference was for a 2.5m wide path. This was explored, however was not able to be accommodated due to the flow on affects this design change would incur, including a decreased number of tree plantings and an increased provision of hardscape area. • Council requested greater consideration of the proposed pedestrian crossing design on Ashford Avenue. Council acknowledged that the wording in the DCP requires a “crossing point” and not a “crossing facility”, however requested that if a marked/raised pedestrian crossing is not provided, the project team justify the design and include it in the SSDA submission. • Council raised that the pedestrian link through the Mount St Joseph Catholic School was not provided in the design. As specified in Appendix D, this is due to ownership arrangements having changed since the establishment of the site-specific DCP. • Council raised that the Horsely Road intersection design conflicts with the C2 zoning. It was discussed that the design utilised the existing arrangement for the left-out design, and that the proposed design preserves the existing tree to the south of this intersection, which is located within the C2 zone. Council had no further comments but wished for it to be discussed further in this EIS – refer Section 7.1. • Council stated that the BDAR does not adequately demonstrate that the mitigation hierarchy has been applied and relies too heavily on the C2 Environmental Conservation zoning carried out at planning proposal. Council was redirected to Section 7.2 of that report which addresses this. The BDAR attached at Appendix K has been updated to include further clarity on the matter.

6.2.2 Transport for NSW

Mirvac and their consultant team have reviewed previous TfNSW comments on the previously submitted and withdrawn DAs to inform the preparation of the SSDA. A summary of key matters raised by TfNSW on 31 March 2025 are provided in **Table 13**.

Table 13 Response to TfNSW Comments

TfNSW Comment	Response
TfNSW is unable to confirm the impact of discharge onto the M5 stormwater drainage basins from the submitted information. Specifically, TfNSW raises concerns with the developer's hydraulic loading onto the M5 stormwater drainage basins.	The proposed WSU drainage system has been designed to ensure no adverse impacts to the M5 motorway. A DRAINS model was prepared to analyse the hydraulic peak flows of the pre and post developed conditions. The Stage 2 development results in less peak flows than under existing conditions. This is because there is a reduction in impervious surfaces from the "Demolition" stage. Therefore, there will be no adverse impacts to the M5 stormwater drainage basins downstream of the WSU site.
Section 1 of the WCMP (Revision 1, Dated 26/09/2024) states that the southern part of the site discharges to an existing vegetated swale within the M5 via multiple headwalls or overland. The swale runs parallel to the southern boundary which conveys flows to the existing culverts (4 x 1500mm dia. RCP) under the freeway and ultimately into the downstream watercourse on the southern side of the M5. It needs to be confirmed that any overland flows are captured by the Detention Basin post development and discharged to the swale via the existing pit and pipe as shown on Drawing 301.	The proposed basin is not a detention basin since on-site detention is not required under Stage 2. Post development once the site is stabilised and 80% of the houses are built, the temporary sediment basin will be converted to a bioretention (raingarden) basin which will treat flows prior to discharging to the M5 land. The Stage 1 and 2 catchment area is picked up by a series of pit, pipes and overland flows which are captured by the proposed basin.
It needs to be confirmed that the detention basin is only expected to overflow in extreme flooding conditions.	This is confirmed. The proposed basin is not a detention basin since on-site detention is not required under Stage 2. Instead, the basin will be a temporary sediment basin during construction and has been designed as per the blue book requirements. Once the site is stabilised and 80% of the houses are built, the temporary sediment basin will be converted to a bioretention (raingarden) basin which will treat flows prior to discharging to the M5 land.
It needs to be confirmed if any retaining walls are planned to be installed along the M5 Motorway boundary. TfNSW advises that there are a number of M5 services located between the existing noise wall and the property boundary.	No retaining walls are proposed to be installed along the M5 Motorway boundary under this SSDA.
The discharge of water onto the M5 land is to be contaminant free. If the water is contaminated it shall be treated before discharge on M5 land. Additional details on the above are required.	As above, water quality modelling has been conducted to determine the WSUD requirements and will be documented within the WCMP. This will outline that water shall be treated before any discharge on M5 land.

Importantly, consultation with TfNSW resulted in a previous application receiving concurrence from the agency, as detailed in the Engagement Report (refer **Appendix BB**).

6.2.3 Community Feedback

Table 14 provides a summary of the key issues raised by the community throughout the engagement process and how this has been responded to within the proposal.

Table 14 Summary of engagement feedback

Theme	Feedback	Response
Traffic / Parking / Public Transport	Many streets effectively become single streets once residents park on both sides of the street, so will the streets be wide enough to allow two-way traffic?	The site-specific DCP includes an 11-metre carriageway width. This allows for parking on both sides of the street while maintaining sufficient space for two-way traffic. In addition, footpath verges on both sides provide safe pedestrian movement.
	What is the parking situation for the new development?	Each home will have a single or double garage, supplemented by on-street parking throughout the neighbourhood. Street designs include dedicated parking bays to accommodate residents and visitors.
	Will there be any bus routes through to East hills, Panania, Revesby stations from the development?	Existing bus routes currently operate along Bullecourt Avenue, providing connections to Bankstown and surrounding centres. The project's traffic and transport assessment, available during public exhibition, outlines these routes.

Theme	Feedback	Response
Footpaths	Will footpaths be on both sides of Ashford Avenue? Are the pathways going to be the full length of Ashford Avenue?	Under the VPA with Council, Mirvac will deliver a footpath along the development side of Ashford Avenue, extending from the southern to the northern boundary of the project land. There is currently no footpath proposed adjacent the existing houses along Ashford Ave.
	Will the footpaths be on both sides of all streets, or only one side and grass on the other side?	The development will include a combination of footpaths and shared paths. Street layouts will vary, with some streets featuring a footpath on one side and a landscaped verge on the other.
Parks	Are any of the parks dog friendly and is it going to be a gated park?	The parks are designed as open spaces for the wider community to enjoy and will not be gated. Discussions with Council are ongoing regarding the potential for a designated dog-friendly area. The current designs do not specifically include an off-leash dog park, but this remains under consideration.
Homes	What is the maximum building heights across the site?	Homes are proposed up to two storeys in height, with a maximum building height of 11 metres. This control applies to most of the residential area and is consistent with the existing character of Milperra.
	Between stages 1 and 2 what are the proposed lot sizes?	Stage 1 lots along Ashford Avenue range from approximately 350m ² to 450m ² . Stage 2 lots are around 300m ² . Future stages will include smaller lots to support a mix of housing types such as terraces and duplexes.
	How will the new houses integrate with the existing, around Ashford Avenue?	Homes along Ashford Avenue are designed to be compatible with the surrounding streetscape, featuring detached larger lots and architectural styles that complement the existing residential character.
Retail	Are there going to be any retail shops in the plans?	There are no retail uses proposed as part of this current application. However, there is land zoned E1 Local Centre within the site that may accommodate retail or community uses in the future. These opportunities will be considered as part of a later stage (SSD lodgement 2).
Construction	During demolition we had a high level of dust impact us – how will this be mitigated for future works?	Dust and other environmental impacts will be actively managed during construction in accordance with approved Environmental Management Plans. Community members can contact Mirvac directly if they experience any environmental concerns. Contact details are available on the project website.
	Can you provide an assurance that power will not be disrupted during business week?	Any planned electrical works that may result in short-term outages will be communicated in advance to affected residents and businesses. Notification will occur through the project's stakeholder engagement process, and measures will be implemented to minimise disruption.

6.3 Future Engagement

Statutory Exhibition

In accordance with Division 2, Section 9 of the EP&A Act, the application will be publicly exhibited for a minimum of 28 days following its submission to the Department. The project team will then prepare a Submissions Report which responds to any further matters raised by the community and Government agencies during this period.

Ongoing Stakeholder Engagement

The project team will continue to consult and engage with key stakeholders throughout the exhibition and assessment period of the project.

It is anticipated that the conditions of approval will require a Construction Environmental Management Plan to be prepared which will include provision for ongoing community consultation throughout the construction of the project and any other post-approval stakeholder consultation strategies.

7.0 Assessment of Impacts

This section of the EIS assesses and responds to the environmental impacts of the proposed SSDA. It addresses the matters for consideration set out in the SEARs (**Appendix A**).

7.1 Biodiversity and Tree Removal

As detailed in the Arboricultural Impact Assessment (AIA) prepared by Temporal Tree Management (refer **Appendix L**), a ground-based visual assessment of 600 trees within the site development area was undertaken by Temporal Tree Management Pty Ltd. on 25 September 2024. A re-assessment of all 600 previously assessed trees was undertaken on 5 August 2025 to provide an updated evaluation of trees' condition and retention values. The assessment of the trees was carried out with consideration of:

- Genus and species / common name
- Maturity
- Number of trees
- Height
- Canopy width
- Diameter of standard height
- Diameter of root flare
- Health
- Structure
- Habitat observed
- Useful life expectancy
- Landscape value
- Retention value
- Notional root zone
- Structural root zone

This assessment determined that a total of 358 trees and tree groups are proposed for removal across the site and 55 can be removed without consent, while 187 trees are proposed to be retained within this SSDA. While the proposed subdivision has sought to minimise tree removal across the site where possible, tree removal will be necessary to construct the road network and subdivision layout. Tree removal was anticipated within the original planning proposal, which ultimately recommended the zoning of the northeast corner of the site with the highest biodiversity values as C2 Environmental Conservation, enabling greater tree removal on the western and southern portion of the site.

The AIA provides the following assessment of the required approval pathways for tree removal:

- 39 trees located within the subject site are under 5m in height and may be removed without consent.
- 5 trees are dead and may also be removed without consent.
- 14 trees are species listed in Chapter 2.3.2.5 of the Canterbury Bankstown DCP 2023 and can be removed without consent.
- 358 trees are classified as prescribed trees under Chapter 3.2 of the Canterbury Bankstown DCP 2023 and therefore require consent for removal.

Notably the SSDA includes the removal of street trees fronting Ashford Avenue, which are required as they're within the footprint of proposed excavation required for the installation of new underground electrical services.

To offset the impacts of removing these 358 trees, the development proposal includes the planting of 605 trees in the public domain and 1,210 trees in residential lots (1,815 total), resulting in a projected canopy coverage of 37.4% across the site. Please note that the Tree Canopy Coverage Plan provided in the Landscape Report prepared by Urbis (refer **Appendix H**) is indicative of the future subdivision and plantings. This figure demonstrates that the proposed development is capable of complying with the DCP control relating to 35% canopy coverage across the site at SSDA 2 lodgement – consent for tree plantings in the future residential lots is not proposed under this SSDA.

Tree species have been selected to complement the adjoining conservation-zoned land to the northeast, which, as detailed throughout this EIS, forms part of a high value Cumberland Plain Woodland ecological community.

This revegetation strategy aims to support the continued expansion of this ecological community and promote enhanced connectivity between green open spaces. The proposed street tree planting will also deliver a range of additional benefits, including but not limited to the following overarching implications:

- Mitigating urban heat by shading hard surfaces such as roads and footpaths.
- Improving pedestrian comfort and walkability through shaded pathways, especially during hotter months. On-street parking will also benefit from increased shade.
- Enhancing visual amenity by introducing greenery into the street network, establishing a high quality benchmark for tree planting in residential areas, and providing visual relief within the urban landscape.

In addition, the BDAR prepared by Cumberland Ecology (refer **Appendix K**) was carried out with consideration of:

- A review of existing data
- A review of landscape features, by desktop review and by field surveys
- Native vegetation surveys
- Threatened flora species survey
- Threatened flora species survey

The BDAR has assessed the proposed vegetation removal and concluded it to be acceptable, having regard to the site's biodiversity values. The proposed development will clear a total of approximately 1.74ha of non-native vegetation, and an additional 6.56 ha of exotic dominated grassland mixed with planted native species. Importantly, the majority of the Cumberland Plain Woodland within the site will be retained, with only 0.57 hectares proposed for removal. The BDAR identifies this loss as unavoidable, due to the internal road layout requirements outlined in the Canterbury Bankstown DCP 2023, which precludes full retention of the ecological community.

The BDAR clarifies under section 7.2, that the proposal has sought to avoid and minimise direct impacts on native vegetation and habitat by:

- Avoiding good-quality, intact native vegetation Cumberland Plain Woodland in the conservation area;
- Amendments to the overall project design and layout to maximise the retention of native trees;
- Amendments to the intersection between Road 2 and Horsley Road to reduce the impact on the conservation area;
- Locating any temporary or ancillary construction facilities to avoid additional clearing of vegetation;
- Redesigning the drainage line as a 1.5m pipe rather than a 4m batter to reduce the impact to existing trees;
- Incorporating a detailed landscape design as part of the project, that will utilise species of Cumberland Plain Woodland, from seeds that have been collected and propagated from within the study area;
- A VMP will be prepared and implemented for the ongoing management, restoration and enhancement of retained Cumberland Plain Woodland within the C2 zoned land; and
- Minimising impacts to biodiversity through the implementation of a suite of mitigation measures including sediment control, tree protection measures, nest box installation and clearing protocols such as pre-clearance and ecological clearance supervision.
- A positive covenant will be created for the management of the asset protection zones (APZ) and management of the conservation area.

The BDAR report further concludes that the proposed removal will not result in fragmentation or disconnection of habitat corridors. While a small reduction in habitat area will occur, existing habitat connectivity will be preserved in the short term and enhanced over time through the retention of vegetation within the site and through additional plantings outlined in the Landscape Plan (refer **Appendix H**).

To facilitate the proposed vegetation removal and retention, the following mitigation measures were outlined in the AIA:

- Prior to the commencement of practical works:
 - A Project Arborist must be appointed for the duration of this development to ensure compliance with the requirements outlined in Section 7 of this report.
 - Fenced TPZs compliant in design with Section 4.3 of AS4970 (2025) must be installed around all retained trees (Figure 7).

- Site boundary fencing will provide suitable protection for all trees positioned outside the subject site (Trees 1, 2, 4-14, 22-27, 29-35, 37-51, 84, 156-159, 212, 213, 237-241, 404-406, 411-414, 427-433, 478-482, 567-571 and 576-582). No additional protection measures are required for these externally owned trees.
- Fourteen fenced TPZs compliant in design with Section 4.3 of AS4970 (2025) must be installed around Tree 62, Trees 63-79, Trees 122-127, Trees 129-138, Trees 139-143, Trees 145-149, Tree 151, Trees 207-208, Trees 209-211, Trees 315-319, Trees 335-349, Trees 355-358, Trees 360-367 and 371-375 to ensure the trees within the subject site are suitably protected.
- Fenced protection zones must extend to the NRZ boundary of the adjacent retained tree where feasible. Fencing must be established no more than 0.3 metres from the nearest edge of proposed bulk earthworks in all other cases.
- Tree Protection Zone signage compliant with the specifications outlined in Section 4.4 of AS4970 (2025) must be installed on all specified fenced protection zones and be adequately visitable from all surrounding portions of the site.
- Shade-cloth must be installed on all fence panels for fenced protection zones to mitigate the transport of dust and liquid contaminants into the protection areas. • Coarse-grained wood-chip mulch must be applied to a depth of 50-70mm within all fenced tree protection areas that are within the boundaries of the subject site.
- A Root Mapping Assessment was undertaken on 05/07/2024 by Temporal Tree Management Pty Ltd, which demonstrated that the proposed driveway within the NRZ of Tree 62 will not impact its viability within the landscape (Appendix L). This element of the proposed development is therefore supported without amendment.
- A second Root Mapping Assessment was undertaken between 20-28/10-2025 by Temporal Tree Management Pty Ltd to accurately determine the impact of the unmitigated Major encroachments sustained by Trees 1, 43, 44, 46, 48, 50, 122, 141, 142, 143, 151, 157, 158, 159, 208, 209, 210, 211, 212, 237, 238, 239, 240, 241, 317, 318, 319, 340, 341, 343, 344, 349, 353, 354, 364, 365, 367, 371, 373, 576 and 577.
- Amendments to the proposed pathway design within the Central Park are recommended adjacent to Trees 1, 319, 354 and 364 to ensure large major roots (diameters of greater than 60mm) are not impacted. The recommended amendments to the pathway design within the Central Park have been suitably incorporated into the Central Park Landscape Concept Plan prepared by Urbis (11/2024) (Figure 9).
- The proposed stormwater line within the northern boundary must also be installed at a minimum depth of 600mm below a large major root growing from Tree 142 (Appendix L).
- The impacts of the Major encroachments sustained by the thirty-seven remaining trees that were included in this Root Mapping Assessment were determined to be acceptable and require no design amendments (Appendix L).
- All test pit excavation required for the AEC01a and AEC03 impacted soil areas that will encroach within the TPZs of Trees 66, 339, 340, 341, 343, 344, 345, 346, 347, 348, 349, 353, 354, 355, 356, 357, 358, 360, 361, 362, 363, 364, 365, 366, 367, 371, 372, 373, 374, 375 or 493 must be undertaken using hand tools only and supervised by the Project Arborist.
- A detailed assessment of the impact of any additional excavation required within the AEC01a and AEC03 impacted soils must be provided by the Project Arborist prior to commencement.
- During construction works:
 - No access is permitted within the specified fenced protection zones. Any required access within the fenced protection zone must be approved by the Project Arborist prior to entry.
 - Ground protection measures compliant with Section 4.5.3 of AS4970 (2025) must be installed prior to any approved access within a fenced protection zone (Figure 8).
 - Fill stockpiles for soil remediation or storage must be located outside specified fenced protection zones for retained trees.
 - Plant equipment is to be kept away from the crown of each tree. No work is to be conducted within the TPZ of each tree. Where required, work is to be conducted from outside of the TPZ, by reaching into the fenced protection zones to minimise soil disturbance and compaction and avoid any branch and trunk damage.
 - The Project Arborist must supervise and inspect demolition and excavation works proposed within the NRZs of Trees 19, 355, 357 and 427. These supervised works must confirm that minimal excavation (max depth 50mm) below the base layer of existing roads and pathways occurs within the NRZs of Trees 19, 355, 357 and 427.
 - The Project Arborist must certify that a maximum excavation depth of 150mm is not exceeded during construction of the footpath in front of Tree 1.
 - The Project Arborist must also supervise the installation of stormwater services within the NRZs of Trees 142 and 143 and certify that the new line is installed under a large major root growing from Tree 142.

- The recommended design amendments within the central park have been incorporated into the proposed Landscape Plan, which will suitably mitigate the impact of the encroachments sustained by Trees 319, 354 and 364.
- Root pruning recommended in the Root Mapping Assessment prepared by Temporal Tree Management Pty Ltd. will be required to facilitate the proposed development (Appendix L). The recommended pruning of twenty-three smaller major roots (maximum diameter of 55 mm) and minor roots was determined to be acceptable and is unlikely to impact the viability of the assessed trees (Appendix L). Approval for all root pruning recommended in the Root Mapping Assessment must be obtained in the Conditions of Consent.
- There must be no unapproved major root (diameter of 40mm or greater) damage or disturbance during the required excavation within the TPZs of retained trees.
- All root pruning must be undertaken by the Project Arborist using a handsaw in compliance with AS4373 (2007) (p. 18). Documentation of all major root cutting and an ongoing monitoring schedule for all affected trees must be provided by the Project Arborist as part of the final arboricultural checklist.
- There must be no other access within the specified fenced tree protection zones. The Project Arborist must be notified and must provide certification if any access is required during the construction process.
- The installation of utilities is required within the eastern boundary of the central park is required within the SRZs of Trees 371, 372 and 373. Installation of this section of services must be undertaken using a directional drill at a minimum depth of 800 mm to mitigate the potential impact on these trees.
- Post Construction – Landscaping:
 - Where required, excavation for planting within a retained Tree's TPZ is to be undertaken manually, to prevent damage to structural roots. Existing soil grades should be maintained with plant container size restricted to a maximum size of 5 litres. No more than 2 plants per square metre for 5 litre pots and 5 plants per square metre for 150 mm pot size. Remedial pruning to crown of tree/s as required to be conducted per AS4373 (2007), to be determined by the Project Arborist.
 - The installation of boundary fencing must be undertaken using hand tools only. Fences must be installed with excavated holes to a maximum depth of 600 mm for posts. Boundary fencing must have the flexibility of design to move a post or pier to be 100 mm clear of any structural root (a root greater than >40 mm diameter) to protect such roots and provide sufficient space for future growth without conflict between the 2 structures. Any posts to be relocated must be approved and certified by a structural engineer or architect.
 - A Level 3 – Advanced Assessment must be undertaken prior to practical completion of works for Trees 344, 345 and 353 to accurately determine the level of risk they pose within the landscape. Risk mitigation works may be required for these three large trees to facilitate their retention within the proposed central park.

7.2 Public Domain & Landscape

Urbis have prepared a Landscape Concept Masterplan for the proposed development (refer **Appendix H** and **Figure 19**).

The objectives for the landscaping include:

- Allow for one tree to be planted in the front and rear yard of each future residential lot.
- Achieve a minimum 35% tree canopy coverage across the site.
- Maximise street tree planting, while balancing the delivery of civil and electrical infrastructure.
- Deliver three (3) new public parks with different passive recreation functions.
- Consider Connecting with Country principles within the design of the public parks.
- Co-locate onsite water detention infrastructure with public open spaces.
- Maximise landscaping within new pedestrian laneways and setback areas.
- Co-locate on-street car parking and carpark with public domain landscaping.



Figure 19 Landscape Concept Masterplan

Source: Urbis

Street Tree Planting

A street tree planting plan is included in this masterplan, aiming to achieve 35% tree canopy coverage across the site through the planting of six different species, in accordance with Chapter 11 of the Canterbury Bankstown DCP 2023. To enhance the overall streetscape character, complementary shrubs and groundcovers are also proposed. The street planting strategy has been carefully developed with a focus on endemic species from the Cumberland Plain Woodland community, which is described in the BDAR as having a positive impact upon the ecological community as a whole. A balanced approach will be taken, incorporating both local provenance seed-propagated plants and commercially available, established stock throughout the development.

Northern Park

The Northern Park places a strong emphasis on sustainability, particularly through integrated stormwater retention strategies. The park's design features layered native plantings and retains a significant number of existing trees, which provide natural shade and enhance the comfort of those moving through the trail network. These elements work together to create a cooling microclimate while contributing to local biodiversity and habitat value.

Importantly, the park also acts as a natural buffer between the proposed residential superlots within the site and the existing industrial development to the north, providing greater amenity for future residential accommodation within the site.

Central Park

The Central Park has been designed to preserve and enhance the site's existing ecological value through the retention of native trees, complemented by additional plantings that strengthen the overall green network. The park's layout follows the natural topography, allowing for a seamless integration with the surrounding landscape. Vegetation extends into adjacent streetscapes, reinforcing ecological connections and tying the park into its urban context.

A strong sense of place is achieved through inclusive, accessible spaces that encourage community gathering and everyday use. Landscape "blisters" soften the transition between built form and nature, expanding the perceived park area and enhancing ecological continuity. Amenities such as informal trails, shelter structures, and seating areas are thoughtfully placed to ensure comfort and accessibility for users of all ages and abilities.

Interpretive elements throughout the park reflect the site's environmental and cultural heritage, fostering deeper engagement. Centrally positioned, the park functions as a vibrant communal hub, with distinct destinations, including nature-based play zones, a bush tucker garden, open lawns, and flexible gathering spaces, all designed to support both active and passive recreation.

Southern Park

The Southern Park celebrates the movement of water through the landscape, using water-sensitive urban design (WSUD) features to manage stormwater, support biodiversity, and create a cooling microclimate. Water elements not only enhance aesthetic appeal but also contribute to habitat creation, enriching both the ecological and experiential qualities of the space.

The park is designed to optimise usability and promote community engagement through well-integrated facilities that support health, wellbeing, and social interaction. Its layout mimics natural systems, using native planting and naturalistic design to foster biodiversity, support local ecosystems, and encourage a stronger connection between people and nature. The inclusion of diverse tree species and sizes enhances environmental resilience, while creative play spaces encourage self-discovery and nurture a lifelong appreciation of nature, particularly among children. Comfortable and safe circulation paths promote physical activity and improve access to nature. The park comprises a sequence of high-quality, unified open spaces that are both distinctive and memorable, offering opportunities for fitness, play, rest, and cultural engagement within a cohesive green framework.

Overall, the proposed parks provide a sense of openness and relief throughout the residential estate, enhancing access to high-quality open space not only within the site but also for the surrounding residential areas. Street tree planting has been thoughtfully designed as a natural extension of these parks, supporting their seamless integration into the broader urban landscape. Importantly, the selected tree species have been chosen with regard to the nearby Cumberland Plain Woodland located in the site's northeast corner, allowing the street tree network to function as a natural continuation of the species community / habitat-forming vegetation within the conservation area.

7.3 Bushfire Hazard

Blackash Bushfire Consulting prepared a Bushfire Hazard Assessment (refer **Appendix Q**) which considers the nature of bush fire prone land within the site and details the subsequent considerations for the proposed development. The Bushfire Hazard Assessment was carried out in accordance with Section 100B of the *Rural Fires Act 1997*, Clause 44 of the *Rural Fires Regulation 2022* and Planning for Bushfire Protection, and is based on the following resources:

- Planning for Bush Fire Protection (NSW RFS, 2019);
- Canterbury Bankstown Council Bushfire Prone Land Map;
- Aerial mapping; and
- Detailed GIS and Site analysis.

The assessment concludes that the proposed development can comply with the *Planning for Bushfire Protection 2019* (PBP), relevant sections of the EP&A Act, and the *Rural Fires Act 1997*, subject to the implementation for the following recommendations:

- All lots within the residential stages that fall within the area designated on the Figure 7 BAL map are to be maintained as an Inner Protection Area (IPA) in accordance with Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW RFS Asset Protection Zone Standards.
- Installation of new water, electricity and gas supplies (where installed) through the proposed development must comply with section 5.3.3 of PBP 2019.
- All new roads on bushfire prone land that fall within the area designated on the Figure 7 BAL map must comply with section 5.3.2 of PBP 2019 as appropriate.

7.4 Flooding / Water Management

A Flood Impact Assessment (FIA) has been prepared by Beveridge Williams to address the following matters raised by Council:

- the flood behaviour in the southern portion of Ashford Avenue and how any change to the overland flow from Ashford Avenue and Flanders Avenue into the site may impact adjacent residential properties;
- any increase in flows into the M5 culverts, and;
- any adverse flood impacts on downstream floodplain i.e. Kelso Park / Swamp.

In carrying out the FIA, the following methodology was utilised:

- Review the received Kelso Stormwater catchment flood model.
- Update the flood model with the actual topographic survey for the site (as opposed to Lidar) and create a proposed scenario with the proposed Finished Surface levels of the site, (other details of changes are list in Section 6 below).
- Simulate the 1% AEP and PMF storm events and assess the resultant flood behaviour and conveyance of water surrounding the subject site.
- Compare existing and proposed scenarios to assess adverse impacts to the western existing residential area, M5 culverts and downstream area of it by comparing existing and proposed scenarios.
- Document in a final report.

Overland flow is concentrated in the southern part of the site due to natural gradients. Filling this area for residential development diverts the flow south along the unconstructed portion of Ashford Avenue to the M5 swale. Although more of this road becomes wet, adjoining properties are generally unaffected.

Hazard categories along Ashford Avenue largely remain H1 for the 100-year event, except for a small intersection section rising to H2. For the PMF event, the hazard category decreases from H5 to H4 over much of the road. Water levels rise slightly at the Flanders Avenue intersection and in the M5 swale during the 100-year event.

M5 Motorway culverts provide sufficient capacity under unblocked conditions for all scenarios, and the development has minimal impact on Kelso Park/Swamp. A sensitivity test using a higher 100-year tailwater (RL 5.5 m) showed negligible impacts on the safety of structures, vehicles, or the community.

Overall, flood impacts associated with all design events are negligible, with no loss of trafficability along Ashford Avenue and no afflux affecting existing residential allotments, no detrimental impact on the existing M5 motorway and flood level increases to the downstream Kelso Park/Swamp area of less than 10mm in 100-Year event and PMF event.

The current design is considered sufficient to manage and mitigate the potential flood-related impacts identified in this assessment. Accordingly, no additional mitigation or management measures are required.

7.5 Contamination

In preparing the Detailed Site Investigation (DSI and RAP) (**Appendix X** and **Y** respectively), EGA conducted a review of the previous contamination assessments carried out for the site to date and has summarised the previous remediation works on the site as being:

- Non-friable asbestos impacted soils encountered within AEC05 during completion of the demolition scope for site across 2024 and 2025 were partially remediated to facilitate continuation of the works in those areas. These partial remediation works generated approximately 2,262m³ of non-friable asbestos impacted spoil which is stockpiled on site atop a geofabric layer.
- Non-friable asbestos impacted soils associated with AEC02 were partially excavated during construction of a sediment basin in the south of site. These partial remediation works generated approximately 4,156m³ of non-friable asbestos impacted spoil which is stockpiled on site atop a geofabric layer.

The early phase of remediation did not relate to any lead, cadmium and zinc-based contamination, nor did it include any remediation works on land that is zoned C2 Environmental Conservation. Refer below **Figure 20** for these areas of previous remediation.



Figure 20 Areas where partial remediation works have occurred.

Source: EGA

The RAP has identified that there are five contaminant groups on the site which require remediation (refer **Figure Y**), including:

- AEC01: Friable / Non-Friable Asbestos and Heavy Metal impacted Surficial and Fill Soils (contaminants of potential concern include Asbestos, Lead, Cadmium and Zinc).
- AEC02: Friable Asbestos impacted Fill Soils (contaminants of potential concern include asbestos).
- AEC03: Non-Friable Asbestos impacted Surficial and Fill Soils (contaminants of potential concern include asbestos).
- AEC04: Potential Underground Storage of Petroleum Products Onsite (contaminants of potential concern include Metals, PAH, BTEX and TRH).
- AEC05: Existing building footprints (contaminants of potential concern include Metals, PAH, BTEX, TRH, PCB, OCP/OPP, Phenols and Asbestos).

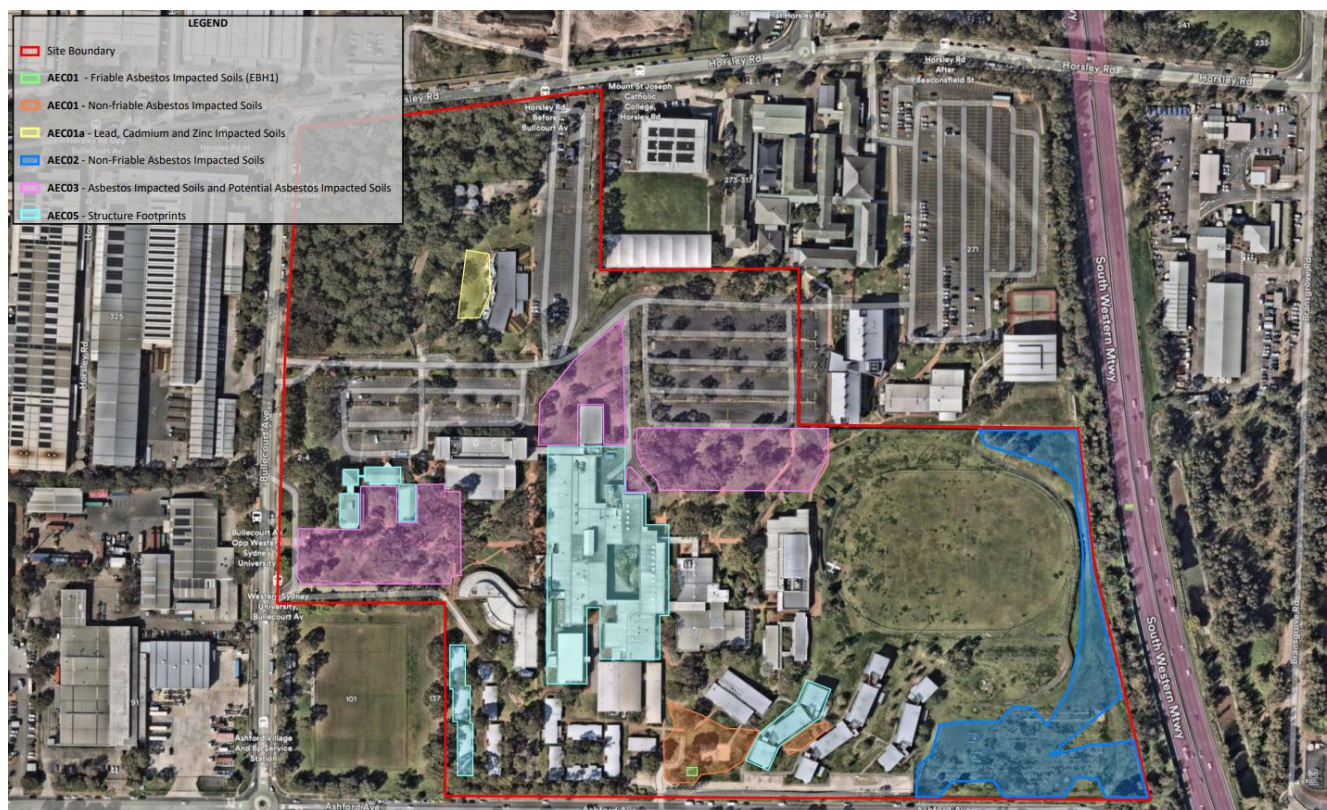


Figure 21 Areas requiring remediation

Source: EGA

The RAP details that the remediation strategy appropriate for each area of environmental concern is:

- AEC01: A combination of excavation and off-site disposal, on-site treatment and beneficial re-use OR excavation and off-site disposal.
- AEC01a, AEC04, AEC06 and AEC07: To be determined following the supplementary contamination assessment.
- AEC02, AEC03 and AEC05: On-site treatment and beneficial re-use OR excavation and off-site disposal.

The remediation strategy for any other contaminants that may be identified throughout the course of the proposed development have been further detailed in the RAP to ensure a complete remediation of the land.

The RAP further states that the remedial goal can be achieved to make the site appropriate for the proposed development subject to the implementation of those strategies.

7.6 Traffic, Access and Parking

A Transport Assessment has been prepared by The Transport Planning Partnership (refer **Appendix U**) which has concluded that the proposed development will not incur any adverse impacts on the surrounding locality or future residents.

Traffic

As outlined in the TIA, this SSDA anticipates the delivery of up to approximately 430 dwellings across the site, following the subdivision of all superlots for low-rise residential development. This is fewer than the approximately 430 dwellings envisaged under the approved Planning Proposal, indicating a reduced overall impact compared to the expectations set by that proposal.

Upon full development, the site is expected to generate approximately 260 vehicle trips (inbound and outbound) during the AM peak hour and 295 trips during the PM peak hour. This represents a reduction of around 32 trips in the AM peak and 36 in the PM peak compared to the traffic generation assumptions in the approved Planning Proposal. In comparison to the site's former university use, the proposed development is expected to result in 22 fewer vehicle trips during the AM peak, but an increase of approximately 100 trips during the PM peak hour.

In consideration of the assessment of the future traffic impact, The Transport Planning Partnership have concluded that no adverse impacts regarding traffic are anticipated. Importantly, the proposed scope of works under this SSDA (comprising only 62 dwellings) can be readily accommodated within the existing street network, as confirmed by the Transport Planning Partnership's assessment, which considered a significantly larger development of 430 dwellings and deemed it acceptable.

Access

The following works are proposed to facilitate appropriate and safe access to the site along Bullecourt Avenue, Ashford Avenue and Horsley Road:

- The existing roundabout on Horsley Road will be retained and will continue to function as a traffic-calming measure (refer **Figure 22**). A new intersection arrangement is proposed that will facilitate left-in and left-out movements into the site from Horsley Road. Whilst the left-out road is located within the C2 zone, this is existing as an access point to the site. Movement of this intersection out of the C2 zone would require removal of the existing significant tree to the south, which is also located in the zone. Preservation of this road in the proposed design allows for the retention of the significant tree and ultimately responds to the objectives of the C2 zone more appropriately.
- A new intersection arrangement along Bullecourt Avenue has been designed to facilitate left-in and right-in movements and left-out movements (refer **Figure 23**).
- The existing separated driveway off Bullecourt Avenue will be modified to a two-way access road (Road 9) with kerb return on either side to align with the kerb line on Bullecourt Avenue. The proposed access road will form a T-intersection with Bullecourt Avenue (refer **Figure 24**).
- A new pedestrian refuge island is proposed along Horsley Road as a further traffic calming device.
- A new pedestrian refuge island is proposed on Ashford Avenue north of Zonnebeke Crescent (outside No.148-150) to support the new driveway access onto Ashford Avenue.

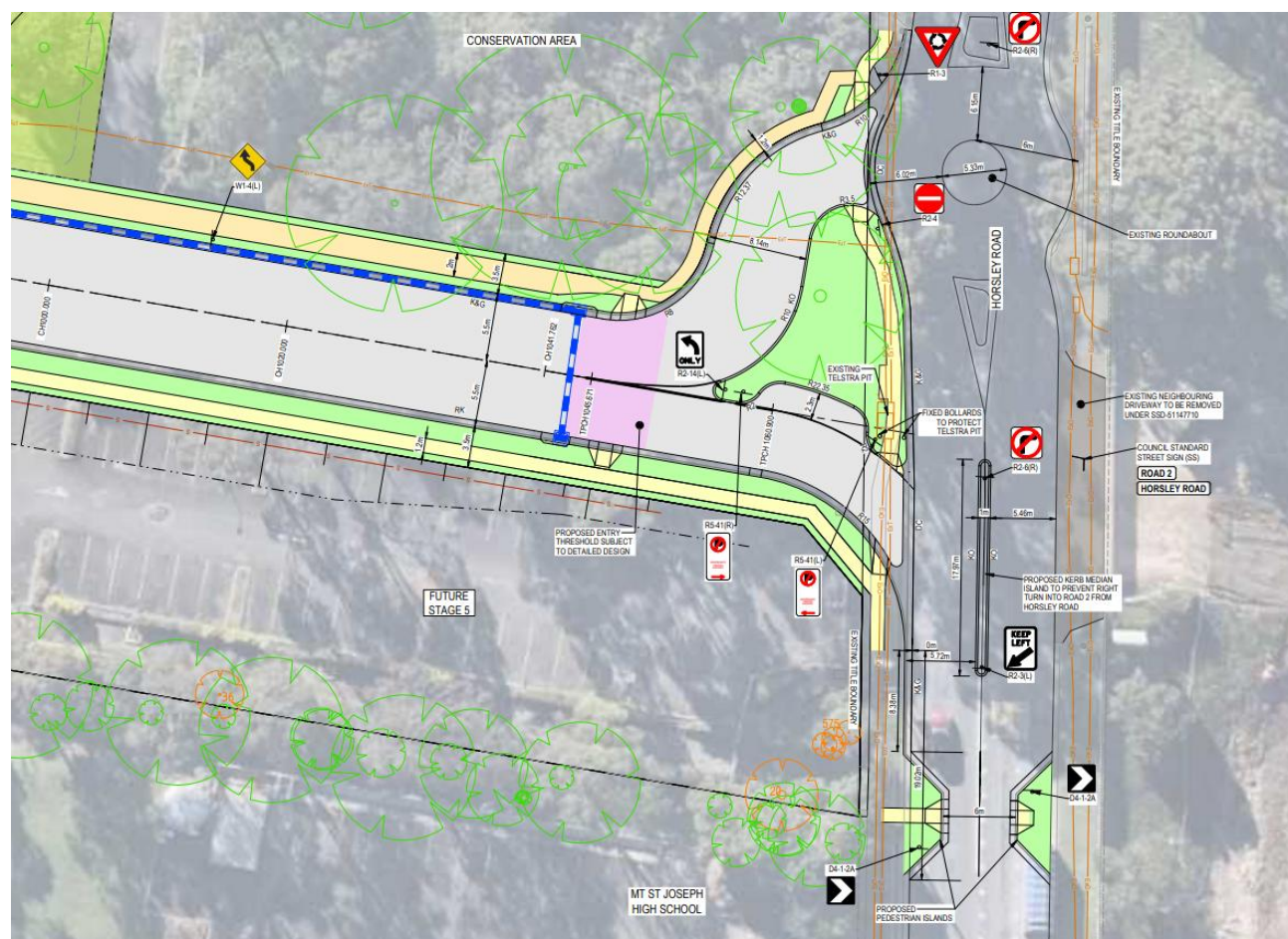


Figure 22 Horsely Road Access Arrangement

Source: Beveridge Williams

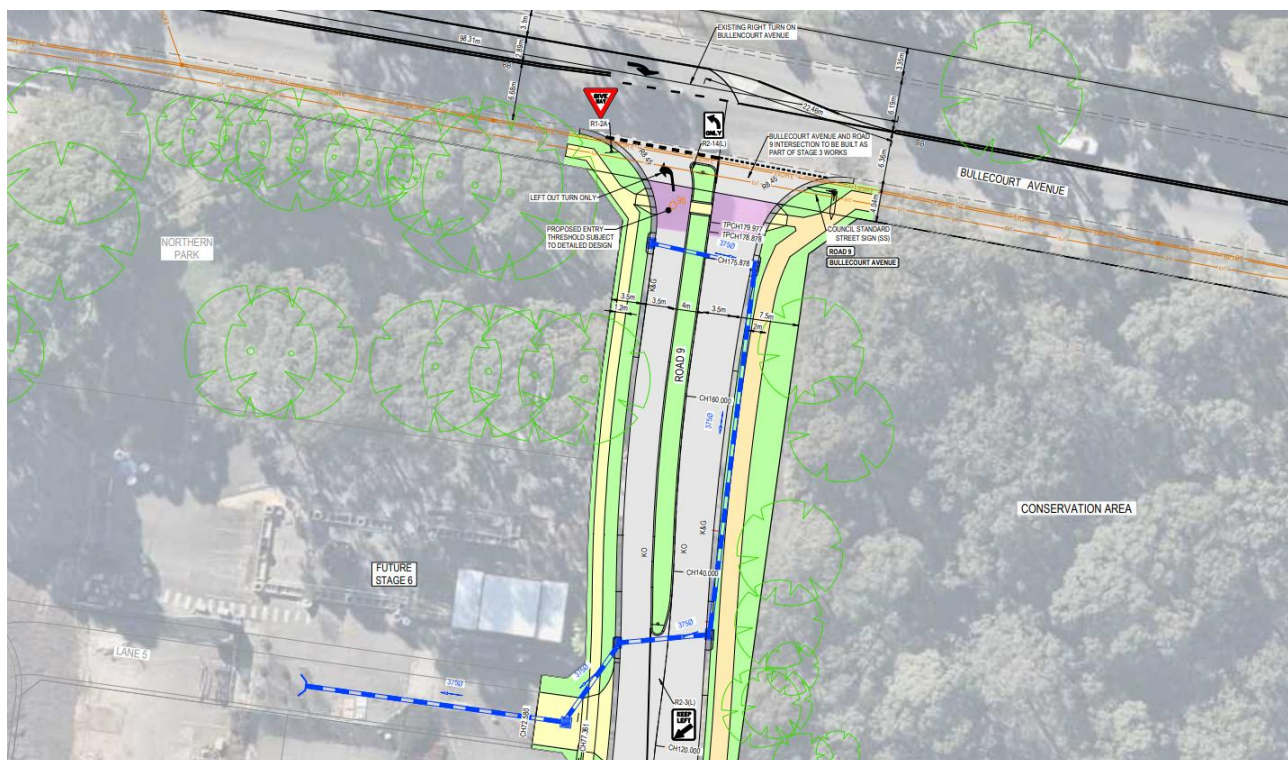


Figure 23 Bullecourt Avenue Access Arrangements

Source: Beveridge Williams

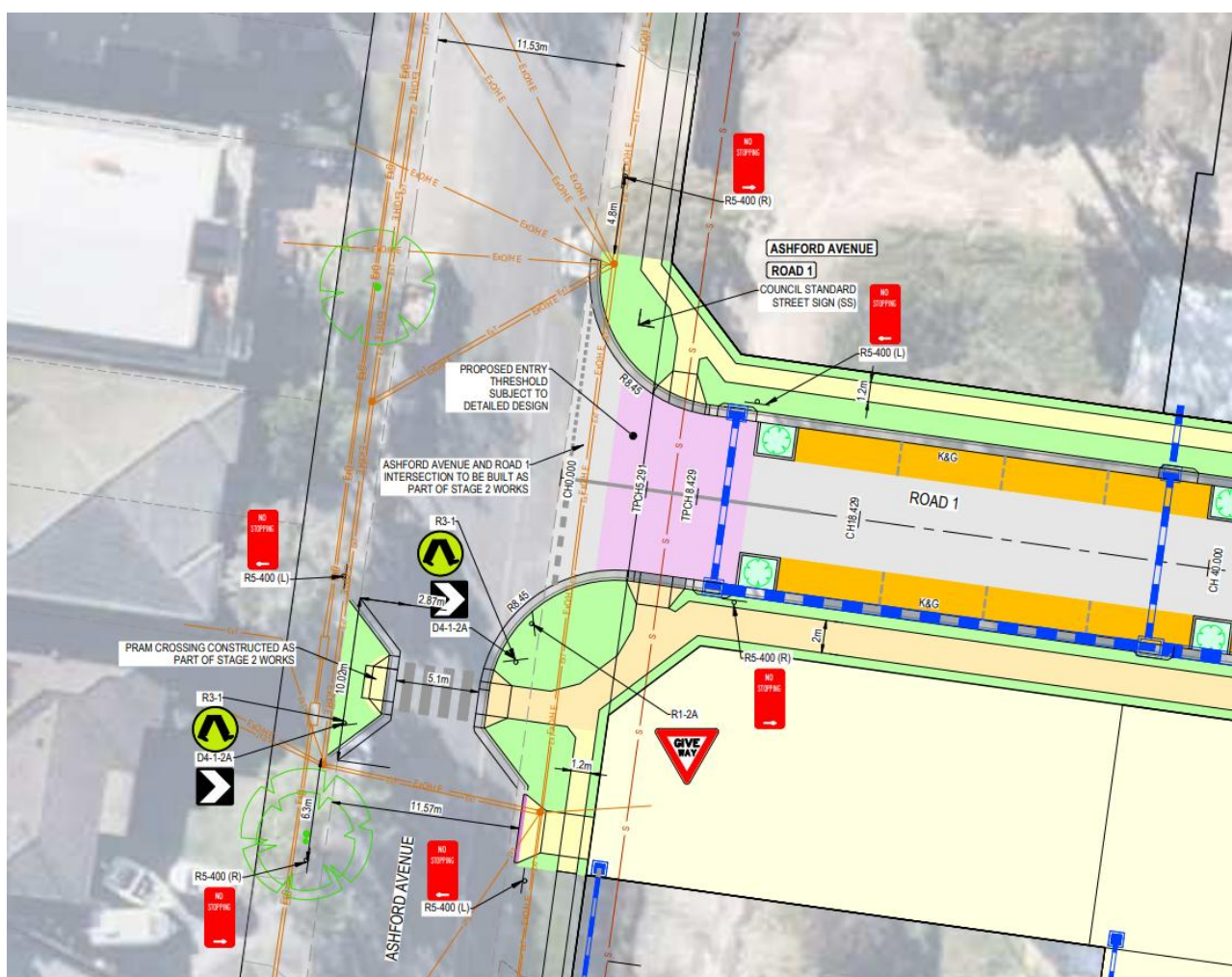


Figure 24 Ashford Avenue Access Arrangement

Source: Beveridge Williams

The proposed road network will be constructed in stages, aligned with the progression of the subdivision, to ensure each stage of the development is adequately serviced by the local road network. Notably, the Stage 1 dwellings will have direct access to Ashford Avenue, eliminating the need for additional roadworks prior to their completion.

The Transport Assessment has confirmed that internal road and intersection designs adhere to Council's requirements and are generally consistent with the site-specific DCP. Moreover, the proposed road network is adequate in providing appropriate permeability, with a balance of vehicular, cycle and pedestrian access measures proposed. The widths of carriageways and verges are provided in accordance with the site-specific DCP, with additional street tree planting integrated into the design to adhere to landscaping controls.

Parking

Each dwelling proposed is provided two car parking spaces, thereby complying with the car parking provision rates in the Canterbury Bankstown DCP 2023. Additionally, on-street parking is provided throughout the street network design, which will aid in servicing the future residential development as well as the proposed public open spaces. The northern open space is provided with additional carparking to serve future visitors.

The development proposes to retain the existing childcare centre and the approved capacity of 67 children. A new car park will be constructed for the existing childcare centre to service both the childcare centre and E1 Local Centre zoned land. The Canterbury Bankstown DCP 2023 stipulates a minimum rate of 1 space per 4 children parking rate for staff and visitor parking. Hence, 17 parking spaces have been provided in line with the minimum DCP requirement for the childcare centre (refer **Figure 25**).



Figure 25 Car parking arrangement for the childcare centre

Source: Beveridge Williams

7.7 Heritage

Aboriginal Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) was prepared by Heritage Now (refer **Appendix T**) for the proposed development. The ACHA was prepared in accordance with the relevant statutory framework as well as Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW, Aboriginal Cultural Heritage Consultation Requirements for Proponents, and Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW. In accordance with these guidelines the ACHA:

- outlined the Project Area and proposed activity (project proposal)
- outlined the Aboriginal consultation process
- provided relevant background information
- has undertaken an assessment of cultural heritage values
- has undertaken an impact assessment, including consideration of avoidance and/or mitigating harm
- provided recommendations.

An archaeological survey of the project area was undertaken by Jenna Weston of Heritage Now and Justine Coplin of Darug Custodian Aboriginal Corporation on 13 August 2025. No Aboriginal objects or areas of potential archaeological deposit were found, and investigations also concluded that majority of the project area has been extensively disturbed. As such, the archaeological sensitivity is assessed to be low and no Aboriginal heritage impacts are anticipated from the proposed works.

The project area is assessed to be of low historic, archaeological and aesthetic significance, and moderate cultural significance. The ACHA subsequently recommends the implementation of various mitigation measures, including:

- All on-site personnel are to be made aware of their obligations under the *National Parks and Wildlife Act 1974*, which includes protection of Aboriginal sites and the reporting of any new, or suspected, Aboriginal heritage sites. All personnel are to be inducted before they carry out any works on the site.
- During the construction phase, in the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the Heritage Consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the *National Parks and Wildlife Act 1974* and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented.
- During the construction phase, in the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, and the remains are determined to be Aboriginal ancestral remains, then Heritage NSW is to be notified via the Environment Line on 131555 and management measures are to be devised in consultation with Registered Aboriginal Parties. Works are not to recommence in the area until the management measures have been implemented.

European Heritage

A Statement of Heritage Impact (SOHI) was prepared by Extent Heritage (refer **Appendix R**) for the proposed development. The methodology utilised is in accordance with the principles and definitions as set out in the guidelines to The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance and the latest version of the Statement of Heritage Impact Guidelines (2023). The SOHI:

- reviewed the relevant statutory heritage controls.
- assessed the impact of the proposal on the site and heritage items in the vicinity.
- made recommendations as to the level of impact.

The site does not contain any mapped European heritage, however, it is bordered to the north by Bullecourt Avenue and to the west by Ashford Avenue which are roads that form part of the locally listed heritage item *Milperra Soldier Settlement (former)* under the Canterbury Bankstown LEP 2023.

The SOHI identifies the heritage significance of these roads as stemming from their association with the Soldier Settlement Scheme, established in 1917. This scheme was a Commonwealth and State government initiative following World War I, aimed at assisting returned servicemen to reintegrate into civilian life by offering them access to rural land

on favourable terms. The Milperra settlement comprised 48 poultry farms and eight vegetable farms, with allotments ranging from four to ten acres.

Over time, agricultural use of the land declined, and in 1973 the area was redeveloped to establish the Western Sydney University campus. Today, the original road layout, including Bullecourt and Ashford Avenues, and the post-1970s subdivision street names are the only remaining physical evidence of the former Milperra Soldier Settlement.

Extent Heritage concluded that the heritage-listed streets retain historical value as the last tangible connection to the Soldier Settlement Scheme. Subject to the considerations of the SOHI's recommendations, the proposed development has been concluded that the proposed subdivision complies with the relevant heritage controls within the Canterbury Bankstown LEP 2023 and the Canterbury Bankstown DCP 2023 and will not result in any adverse impacts on the significance or character of the heritage item.

The SOHI ultimately made the following recommendations:

- Existing street trees should be retained where feasible. Street tree planting is encouraged where it enhances the axis of the historic streetscape pattern along Ashford Avenue and Bullecourt Avenue.
- Preparation of a Heritage Interpretation Plan (refer below and **Appendix S**).
- Preparation of an ACHAR (refer above and **Appendix T**).
- An Unexpected Finds Protocol should be developed by an archaeologist with demonstrated experience and understanding of the required obligations in accordance with the Heritage Act. This protocol would include a pre-start briefing of contractors regarding the type of material that may be uncovered during works and their obligations under the Heritage Act. The procedure should also outline a process for protecting and identifying unexpected archaeological material, if uncovered during works.

Heritage Interpretation Plan

A Heritage Interpretation Plan (HIP) has been prepared by Urbis (refer **Appendix S**) in accordance with best practice guidelines for heritage interpretation to ensure strategic, meaningful and accessible interpretive elements are embedded into the new residential site and public domain, specifically:

- NSW Heritage Council, NSW Heritage Manual
- NSW Heritage Council, Interpreting Heritage Places and Items: Guidelines
- NSW Heritage Council, Heritage Interpretation Policy
- Australian Heritage Commission, Ask First: A Guide to Respecting Indigenous Heritage Places and Values
- Government Architect NSW, Draft Connecting with Country Framework.

The HIP is required by Section 3.9 Heritage of the site-specific DCP and seeks to preserve and even enhance the interpretation of both Aboriginal and European heritage throughout the site. The HIP provides an implementation plan (refer **Figure 26**) to ensure the findings and recommendations of the HIP are incorporated into the future development.

Ref	Element	Next steps
Core Elements		
1	Acknowledgment of and Respecting Country	- Confirm location and medium of Acknowledgement of Country - Collaborate with Mirvac, WSU and appropriate stakeholder groups to draft proposed wording - Source and engage Dharug artist (if required). Artist / designer must be engaged separately by Mirvac. - Consult on Acknowledgement of Country wording and design with appropriate stakeholder and consent authorities - Design, manufacture and install element.
2	Landscaping	Continue to develop landscape design including endemic plantings.
3	Inlays	- Confirm location, medium and theme for inlays - Source and engage Dharug artist and / or graphic designer (if required). Artist / designer must be engaged separately by Mirvac. - Incorporate other elements (e.g. ground inlays) into landscaping design - Manufacture and install.
4	Signage	- Confirm location, medium and theme for signage - Urbis to prepare content, including historical photographs. Source a graphic designer (if required). - Consult on content and design with appropriate stakeholder and consent authorities - Manufacture and install.
Complementary Elements		
5	Naming strategy	- Preparation of Naming Strategy - Consultation with appropriate consent authorities.
6	Play spaces	- Landscaping and play teams, and other consultants as required, to design and receive approval of concept - Other consultants to design, implement and install.
7	Public art	- Public Art Strategy expected to be conditions as part of the DA consent. - Urbis can assist with engagement of artists or designers as required through preparation of artist briefs. Artist / designer must be engaged separately by Mirvac.

Figure 26 HIP Implementation Plan

Source: Urbis

7.8 Residential Development and Amenity

During Construction

The staging of the development was carried out in consultation with Council to establish an appropriate delivery of housing and infrastructure. It was established that the delivery of the first 62 houses under this application would act as an acoustic barrier between the site and the existing residential dwellings on Ashford Avenue whilst the remaining works are carried out.

The proposed staging also takes into consideration the existing conditions of the site, and subsequently the construction methodology required to approach stormwater management and cut and fill. The construction of the proposed dwellings in their proposed location, allows for a less invasive approach to cut and fill and stormwater management, and therefore requires more minimal works with a lesser impact on future residents.

Through the utilisation of the existing entrance on Ashford Avenue, the proposed development also benefits from the existing transport network in the site's surrounds as well as that provided in Stages 1 and 2 for future residents. This access will allow for residents to avoid conflicts with construction vehicles which will be accessing the site via Bullecourt Avenue and Horsely Road to complete the works in the remaining stages of the proposed development.

Additionally, the Acoustic Report (refer **Appendix W**) has considered the potential impacts of the proposed construction outside of Stages 1 and 2, and has provided recommendations for the construction of the proposed dwellings to mitigate any potential noise and vibration impacts (refer **Section 7.12**).

Following Completion

As assessed in **Appendix D**, the built form of the proposed residential development is generally consistent with the provisions of the Canterbury Bankstown Development Control Plan (DCP) 2023.

Residential amenity has been a central consideration in the design of the proposed development. As detailed in **Appendix D**, the residential component aligns with the relevant controls of the Canterbury Bankstown DCP 2023, particularly those relating to noise mitigation, solar access, natural ventilation and visual privacy.

- Noise mitigation: Mitigation measures have been applied to certain residential properties to ensure that acoustic impacts from surrounding road network and the proposed construction does not have any adverse impacts on residents.
- Solar access: As shown in the architectural plans at **Appendix G**, the proposed dwellings receive adequate solar access to internal living areas as well as private open spaces.
- Natural ventilation: The proposed dwellings all allow for cross ventilation.
- Visual privacy: Windows and openings in the dwellings have been designed to minimise overlooking into surrounding private properties whilst maintaining adequate passive surveillance over the public domain.

In addition, the broader masterplan enhances amenity through the integration of accessible and embellished green open spaces, strategically distributed to ensure that all dwellings are located within walking distance of embellished open space. The proposed street tree planting strategy further supports residential amenity by improving walkability across the site, enhancing the visual character of the urban environment, and contributing to urban cooling, habitat creation, and air quality improvement.

Overall, the proposed development will deliver a high-quality residential environment that prioritises liveability, comfort, and environmental performance, in line with the objectives of the Canterbury Bankstown DCP 2023.

7.9 Infrastructure Staging

The proposed staging plan has been carefully designed to enable the coordinated delivery of development and supporting infrastructure at appropriate times.

A key consideration in the staging sequence is the progressive implementation of stormwater management works, ensuring runoff is effectively managed throughout the site as development proceeds. Stages 1 and 2 are intended to be delivered first. As outlined in the WCMP, demolition works approved under DA1512/2023 will substantially reduce impervious surfaces, resulting in less stormwater runoff compared to existing conditions. Consequently, no on-site detention (OSD) is required for these early stages.

To manage water quality, however, a temporary 68m² raingarden and 675m² surface area will be constructed within the existing sediment basin approved under the demolition DA. Stormwater will be discharged via the existing pipe and headwall to the M5 corridor, with no works required within M5 land. Permanent Basins 1 and 2, servicing the entire southern catchment including Stages 1, 2, 4, 5, and part of Stage 7, will be constructed as part of Stage 4. Following their completion, the temporary raingarden and basin used for Stages 1 and 2 will be decommissioned. For Stages 3 and 6, a temporary basin will be delivered as part of Stage 3 civil works. Although OSD is not required in the northern catchment, a 169m² temporary raingarden will be established within the future Stage 6 site to address water quality needs. This will remain in operation until the permanent Basin 3 is constructed.

The staging also supports the early release of residential land, with dwellings to be delivered in Stages 1 and 2. This sequencing improves commercial viability and ensures momentum for subsequent stages. These early residential works are coordinated with the delivery of Central Park and the proposed roads, ensuring future residents benefit from immediate access to high-quality open space.

Additionally, the staging facilitates the timely operation of the proposed childcare centre in Stage 3. Delivering this early enables service provision to the broader community from the outset while reducing potential disruptions during later construction phases.

7.10 Community Title

The creation of a community title lot is proposed as part of this SSDA covering approximately 28,432m² in the northeast corner of the site. This community title will include three lots:

- Lot 1 (Community Lot): 2.158ha zoned C2 Environmental Conservation, jointly owned and managed by the Community Association formed by the owners of Lots 2 and 3. The Community Association will be responsible for:
 - Shared maintenance and insurance of Lot 1 – incl. Vegetation Management Plan (**VMP**)
 - Ongoing management and compliance with conservation obligations
 - Equitable cost-sharing based on gross land area of Lots 2 and 3
 - Benefit from Telco Lease
 - Management of the private carpark space (for e.g. it could be leased to the childcare centre, adjacent retail tenancy, or sales office etc.)
 - Vegetation management of the C2 Environmental Conservation zoned land, including the Cumberland plain woodland area located in lot 1
 - Maintenance of pedestrian paths and turfed areas
 - Operational requirements including as relevant:
 - Commercial waste collection
 - Management of parking
 - APZ management
- Lot 2: 5,700m², includes an existing operational 65-place childcare centre, new road and carpark (car park is proposed to be constructed under this SSDA).
- Lot 3: 1,152m² vacant land; Purchaser of Lot 2 will be granted a legally binding first right of refusal (**FRR**) over Lot 3 if Lot 3 is ever offered for sale, the Lot 2 owner will have the right to match any third-party offer.

Both Lot 2 and Lot 3 owners will:

- Share rights of access and use (if applicable) over Lot 1, as per a Community Management Scheme (**CMS**).
- Be jointly responsible for maintenance, insurance, and statutory obligations.
- Govern these through the Community Association bylaws and constitution.

The proposed Community Title Scheme will ensure the appropriate maintenance of the C2 zoned land in perpetuity without burdening future residents of the proposed development.

The management of the lots proposed within the Community Title Scheme will be carried out via the Community Management Statement which can be found at **Appendix RR**.

7.11 Visual Impact

Urbis have prepared a visual impact analysis as part of the Urban Context Report (refer **Appendix II**).

Surrounding Visual Context and Visual Catchment

The site is set within a mixed suburban and light industrial context. To the north-west, it adjoins Milperra Reserve, which features a central turfed sports field, amenities building, and scattered perimeter trees. To the north-east lies a substantial area of protected remnant Cumberland Plain Woodland. Surrounding industrial and commercial buildings to the north and east are generally one- to two-storeys, with rectilinear metal or rendered façades and extensive hardstand areas, creating a contrasting scale and texture to the predominantly residential environment.

To the east, Mount St Joseph Catholic College comprises low- to double-storey buildings ranging from older brick structures to contemporary developments. Its sports facilities, including an oval, covered courts, and tennis courts, are well-integrated into the landscape, providing significant green space within the campus.

The residential built form west of the site, including Ashford Avenue along the western site boundary, is predominantly low-rise, comprising single-storey brick dwellings and an increasing number of contemporary two-storey houses and duplex developments on medium-frontage suburban lots. These residences typically feature tiled roofs (hip/gable), landscaped front gardens and small ornamental trees which contribute to a vegetated streetscape. Street tree planting is irregular, and canopy coverage is fragmented.

The M5 South Western Motorway forms a physical and visual boundary to the south of the site.

An extract of the indicative viewshed is shown at **Figure 27**.



Figure 27 Indicative viewshed

Source: Urbis

This indicative viewshed has confirmed that:

- Potential visibility from the public domain is highest from immediately surrounding roads including Ashford Avenue, Bullecourt Avenue and Horsley Road.
- Milperra Reserve is the only public recreation space that will have views of any of the proposed development due to its location on the site boundary.
- Visual impacts on private domain views are restricted to dwellings on Ashford Avenue.
- Dwellings on Ashford Avenue would block views from residential development further to the west.
- Views from the M5 are not possible due to noise walls.
- Large scale commercial and distribution development to the north and east block long distance views beyond in both directions.

Visual Impact

Potential visibility of the proposed development will be greatest from Ashford Avenue and Milperra Reserve. Views from Bullecourt Avenue will be limited due to the proposed park along the northern boundary and the retention of the Cumberland Plain Woodland to the north-east. Similarly, views from Horsley Road are restricted by the setback of the built form and the intervening development of Mount St Joseph Catholic College. There will be no visual impacts from the south of the site due to the location of the M5 Motorway.

Proposed tree planting along the western site boundary will further filter views of the built form from Ashford Avenue, and the two-storey residential development is visually compatible with the existing single- and double-storey dwellings along Ashford Avenue. Residents on Ashford Avenue previously had views of up to three-storey development within the former WSU campus and are therefore unlikely to perceive the proposed two-storey development as novel or unexpected. Users of Milperra Reserve would similarly have previously experienced views of development to the south, making the new development unlikely to appear out of place within the landscape.

Overall, the potential visual catchment of the proposed two-storey development is small and largely confined to the immediate surrounding roads and properties. The proposal is highly compatible with surrounding residential development in terms of height and scale, maintains consistency with previous built form on the site, and does not impact heritage-listed items to the north and west.

7.12 Noise and Vibration

Renzo Tonin & Associates have prepared an Acoustic Assessment (refer **Appendix W**). In order to assess the potential noise impact on the subdivision site, the following methodology was used:

- Determine existing road traffic noise levels impacting on-site.
- Determine the extent of noise impacts at proposed residential lots using the results of the noise monitoring and predictive noise modelling.
- Identify where road traffic noise intrusion onto the site may exceed the relevant criteria.
- Identify industrial noise impacts on proposed residential lots using the results of the attended and unattended noise monitoring.
- Where external noise levels are predicted to exceed the noise criteria, in-principal recommendations are provided for building envelope design to achieve internal noise criteria.

Unattended long-term noise monitoring was undertaken in December 2019 to establish background and ambient noise levels around the site. These results were subsequently verified through short-term attended noise measurements conducted in July 2022, and again in September 2024, confirming that background and ambient noise conditions remain unchanged.

The Acoustic Assessment notes that there are some potential impacts on existing residents surrounding the site, as well as those who will occupy the dwellings proposed in Stage 1 and 2 whilst the remaining site is developed. Subsequently, recommended the implementation of the following mitigation measures as detailed in the report:

- General bulk earthworks methods:
 - Use of excavator with bucket should be used whenever feasible in order to conduct bulk earth works of buildings and hard stand areas.

- Use of hydraulic hammers should be adopted only when use of excavators with bucket is not feasible (e.g. breaking of ground slabs or similar).
- Any equipment not in use for extended periods during construction work must be switched off.
- The offset distance between noisy fixed plant (if any) and adjacent sensitive receivers is to be maximised where practicable.
- Avoid stockpiling spoil within 50m of the Child Care Centre or St Joseph Catholic School.
- Noise mitigation and respite periods:
 - Residences on Ashford Ave – given the risk of exceedance of Highly Noise Affected Levels when using hydraulic hammers on the western edge of the site, it is recommended that works within 30m of the western boundary of the site should not commence prior to 8am.
 - Unless agreed otherwise with the school, work within 50m of the school buildings using a hydraulic hammer is not recommended during class times.
 - Unless agreed otherwise with the Childcare centre, work within 50m of the buildings using a hydraulic hammer is not recommended during sleeping times (this will apply to works at stages 5 & 6).
- Notification
 - Ashford Ave Residences: Given the risk of exceedance of the Noise Management Level, these residences should be notified with respect to work on western edge of the site. The notification should detail:
 - Proposed start and finish date for each of the stages.
 - Typical daily start time.
 - Proposed start time (8am) for use of a hydraulic hammer when working on western boundary.
 - Child Care Centre: Given the risk of exceedance of the Noise Management Level, the Childcare centre should be notified with respect to works in Stages 5 and 6 (Stages 1, 2, 3, 4 and 7 are highly unlikely to result in noise and vibration impacts on the childcare centre). The notification should detail:
 - Proposed start and finish date for each of the stages.
 - Proposed respite period with respect to use of Hydraulic Hammer during sleep times.
 - Mount St Joseph Catholic School: Given the risk of exceedance of the Noise Management Level, the school should be notified with respect to work in Stages 5 and 4. The notification should detail:
 - Proposed start and finish date for each of the stages.
 - Proposed respite period with respect to use of Hydraulic Hammer during class times.
- Dilapidation surveys should be carried out for the childcare centre and the school buildings located along the western edge of the Mount St Joseph Catholic School grounds if a hydraulic hammer is to be used within the buffer distances specified in Table 8-10.
- Notification by letterbox drop would be carried out for all occupied buildings within 50m of the construction site. These measures are to address potential community concerns that perceived vibration may cause damage to property.
- Establishment of buffer distances between construction equipment and the School and Childcare centre as detailed in Section 6. In the event that works will be required within the safe buffer distance, vibration monitoring should be conducted during those works. The monitor should be capable of providing SMS notification to contractor in the event that vibration levels reach designated thresholds.
- Where vibration is found to exceed threshold limits with respect to building/infrastructure damage, management measures should be implemented to ensure vibration compliance is achieved. Management measures may include modification of construction methods such as using smaller equipment (hammer size), use of concrete saws/munchers in place of hammers, and use of non-vibratory compaction rollers.
- A management procedure will need to be put in place to deal with noise complaints that may arise from construction activities.

Importantly, the operational noise impact from the existing childcare centre on the future residences has been assessed and is predicted to comply, with no mitigation measures required.

Based on anticipated noise impacts identified through previous noise modelling, a range of mitigation measures will be implemented to ensure that the proposed residential development appropriately manages and minimises potential road noise amenity impacts. These measures include:

- Indicative building construction requirements.

- Provision of alternative ventilation solutions.
- Installation of appropriate boundary fencing.

7.13 Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) Report has been prepared by Urbis (refer **Appendix JJ**) and concludes that the proposal is consistent with the four CPTED Principles: Surveillance, Access Control, Territorial Reinforcement, and Space and Activity Control. The assessment considered the three public open spaces, as well as the proposed street network / public domain areas and the residential areas.

The assessment found that the proposal is aligned with the Canterbury–Bankstown DCP 2023 and other relevant policy frameworks, which seek to enhance connectivity and improve local amenity. Importantly, the CPTED Assessment provided recommendations to further increase safety and security in the study area, including:

- Surveillance:
 - Incorporate lighting in any areas intended for nighttime use (such as sensor lighting along the entry pathways, or any seating areas in communal areas) to increase perceptions of safety and avoid dark areas which may act as points of entrapment. In particular:
 - Ensure that lighting is permanently on, or movement activated, along pedestrian paths, carpark and public transport access points to provide visibility at night.
 - Seating should be positioned along the main footpath and around the basin to encourage legitimate use of the space and provide opportunities for passive surveillance. Benches should be placed in locations with clear sightlines to other park areas, paths, and entrances, avoiding hidden or obscured spots.
 - Consider incorporating further seating options throughout the park, particularly at high use areas such as the playground and oval. The inclusion of additional seating can encourage longer-stay use and deliver greater levels of accessibility, enhancing opportunities for passive surveillance and regular usage.
 - Consider embellishments such as bubblers, bins, and dog waste bins to encourage longer-stay use. These embellishments can lengthen the duration of visitor's stay, increasing opportunities for passive surveillance while also increasing regular levels of activation. These embellishments can also increase the ability for visitors to care for the park, contributing to a greater perception of a well-maintained and cared for space. This can be considered during detailed design stages.
 - Design lighting to ensure all activity and areas intended for nighttime use such as key pathways and entry points remain visible, avoiding glare and shadowed pockets that could reduce visibility.
 - Provide targeted lighting for the active wall to ensure it is visible and monitored during use, reducing opportunities for concealment or anti-social behaviour, and integrating it into active circulation routes.
 - Position seating and gathering areas to overlook main pathways, entries, and activity nodes, increasing casual observation by legitimate users.
 - Maintain clear sightlines across the amphitheatre lawn, sport court, and fitness zone by avoiding dense planting or structures that obstruct views.
 - Encourage activation of the park during daylight hours through programming and community events, increasing the presence of legitimate users.
 - Ensure that the communal open space areas have low-level lighting at all times, with sensor lighting at seating areas, to provide visibility at night.
- Access Control and Movement:
 - Provide a signage and wayfinding map at all entrances to the park showing clear pedestrian paths and key activity points to enable users to identify direct and accessible routes, as well as the locations of available entrance/exit points throughout the day and night.
 - Install lighting along the Basin edges to improve visibility at night and reduce the risk of accidental falls. Consider opportunities to embellish lighting surrounding the basin into a form of artwork or attraction, further activating the space, particularly at nighttime.
 - Implement wayfinding with universal legibility throughout Central Park to differentiate uses and to define formal 'safe routes' through Central Park to key destinations. Areas lacking movement cues are susceptible to anti-social behaviour.
 - Clearly define entry points along Horsley Road and adjoining streets with wayfinding elements, signage, and landscape cues to guide visitors into active areas and along pedestrian footpaths.

- Maintain the main north–south pathway as the primary circulation spine, ensuring it connects all major activity nodes and supports predictable movement.
- Ensure the northern traverse pathway and secondary permeable pavement path above the overflow turf area (as detailed in the Landscape Design Report) are well-lit and connected to active spaces.
- Provide suitable alternative pathways to stairways and terraced areas to ensure accessibility for all users, including those with mobility needs.
- Address the lack of formal footpaths along Horsley Road by incorporating clear pedestrian entry routes into the park design, ensuring safe and legible access from the street.
- Territorial Reinforcement:
 - Consider incorporating programmed activities into the unstructured open spaces of the park (e.g. giant chess) in order to activate the space and promote increased passive surveillance.
 - Install signage that explains the ecological significance of the Basins to encourage community care and connection to these natural assets, as well as to minimise environmental impacts.
 - The materials and designs of seating should be durable, comfortable, and low-maintenance. Lighting should be adequate to ensure visibility during evening hours, and seating should be arranged to allow users to face both the basin and pedestrian movement along the path, supporting natural observation and a sense of safety.
 - Incorporate changed pavement, contrasting colour, and/or raised elevation in areas where footpaths transition from public space towards private, such as at the main entry points to each dwelling. These small changes in material, colour, or texture can act as a subtle reinforcement for people to avoid entering areas where they are not permitted, as well as a symbolic boundary of public/private space.
 - Consider program activations in the open lawn area, informal trails, and bush tucker garden (e.g. regular exercise classes, gardening sessions) to encourage incidental interaction, sense of ownership and community building.
 - Use low-level native planting and terraced seating to further define basin edges. The inclusion of further territorial reinforcements will help to guide movement and discourage informal or unsafe access to steep or sensitive areas.
 - The external façade and streetscape interfaces should be well-lit and visually interesting. This enhances community ownership and passive surveillance while deterring vandalism, in line with CPTED principles of natural surveillance, territorial reinforcement, and maintenance.
 - Consider the inclusion of public art throughout the public domain to enhance the estate's identity, encourage community ownership, and increase legitimate use of the space. Statement art pieces can also contribute to wayfinding and ease of navigation, acting as a landmark to guide residents and visitors.
 - Ensure that the external façade and streetscape interfaces are well-lit, visually interesting (i.e. public art, robust fixtures) and use a darker coloured paint in order to reduce graffiti. This can enhance community ownership and passive surveillance from the site, whilst deterring graffiti by having elements that are not able to be easily vandalised.
 - To further enhance the delineation of public and private space, consider incorporating elements which reinforce territorial boundaries, such as changed material or colour for driveways, as well as landscaping or fencing which can serve as natural barriers.
- Space and activity management:
 - Adhere to the requirements and compliance regulations outlined in the maintenance notes (Landscape Design Report, 2025) to ensure the site is well kept and remains activated.
 - If any additional programming or amenities are included, ensure to include details relating to regular cleaning, monitoring, and maintenance within the Plan of Management.
 - Establish clear operational responsibilities for litter collection, lighting maintenance, and landscape upkeep to ensure the park remains in good condition.
 - Program spaces for seasonal events, fitness activities, and community gatherings to maintain activation and support legitimate and diverse use throughout the year. This could include regular yoga or fitness classes, pop-up holiday markets, outdoor movie nights, or community gardening classes.
 - Regularly monitor high-use areas such as the sport court, amphitheatre lawn, and active wall to ensure they remain safe, functional, and free from damage.
 - Integrate habitats for native species into active areas to avoid creating isolated or unused pockets, balancing biodiversity with safety.
 - Use robust, vandal-resistant materials such as stone, concrete, timber, and steel to maintain a high-quality appearance and reduce long-term maintenance need.

- Ensure that the Plan of Management clearly indicate the designated areas of responsibility for the management of anti-social behaviour.
- The Plan of Management must also clearly indicate the designated areas of responsibility for the management of private land and the public domain to ensure the precinct is well kept.

7.14 Social Impact Assessment

In accordance with the Social Impact Assessment Guideline for State Significant Projects (July 2025), a Social Impact Assessment has been provided within this section to assess the likely positive and negative social impacts of the proposed development during construction and operation, and a detailed impact and mitigation assessment is provided within **Table 16**.

Relevant Project Features

The proposed development comprises the use of the site as an extension of the existing low density residential neighbourhood to the west, and comprises 62 residential lots, superlots to be subdivided under the future SSDA 2 lodgement, public open spaces, provision of a new road network and car parks, and conservation works. The project will allow for the construction of up to 430 dwellings on the site alongside complementary uses to serve future residents as well as those existing in the surrounding area. The first residents are expected to move into the first dwellings in late 2027, and construction of the overarching project is expected to conclude in early 2030.

Social Context

The development is situated within an existing low density residential area of Milperra and is surrounded by various land uses including industrial, commercial, educational and low density residential land uses. The site is currently vacant and fenced off given recent demolition works and following the relocation of the WSU Campus, and therefore provides no existing public benefit to the surrounding community. The site is well-serviced by existing transport infrastructure, which will facilitate access to centres such as Bankstown, Miranda and Burwood, as well as centres accessible via the T6 and T8 trainlines. The site has access to social infrastructure such as the Mount St Joseph Secondary and Panania North Public Schools, Milperra Reserve and other small open spaces distributed throughout the residential areas of the locality.

Relevant Engagement Outcomes

Engagement with the local community was undertaken as addressed in **Section 6.0**. The community provided commentary on the proposal which has been considered in this Social Impact Assessment. Construction impacts were raised including heavy vehicle movement and impacts of dust, noise and vibration. Given the site's location and its interface with Mount St Josephs Secondary School, construction activities will generate impacts on the surrounding community, however, these will be temporary in nature and can be appropriately managed through mitigation measures, as addressed in **Table 16**. Traffic impacts as a result of the development were also raised by the community, including volume of traffic, and impacts upon street parking, and is also addressed in **Table 16**.

Positive Social Impacts

The proposed development will provide several wide-reaching social benefits to the community, including:

- **Housing supply and security:** The proposed development will significantly increase the housing stock within the Canterbury Bankstown LGA, with a particular emphasis on delivering detached dwelling houses. This is notable, as large-scale residential developments in the LGA are typically characterised by high-density housing, making the provision of a substantial number of low-density dwellings a rare and valuable contribution to housing diversity in the LGA.
- **Heritage sensitivity:** The proposed development is sensitive towards the heritage significance of the locality, maintaining significant consideration of the area's historic significance regarding Aboriginal occupation and then as the Milperra Soldier Settlement.
- **Access to social infrastructure:** The proposed works improve access to social infrastructure, public transport, and local services for the locality as a whole, and subsequently promotes social inclusion by creating a more walkable and connected neighbourhood. Furthermore, it strengthens the local community by fostering opportunities for social interaction in shared spaces. Additionally, the proposed permeability of the site improves safety and accessibility through the provision of shared paths.
- **Public domain design:** The proposed development enhances the overall liveability and amenity of the area through high-quality urban design and landscaping.

Negative Social Impacts

Although the proposed development will deliver significant public benefits, temporary and perceived negative impacts may arise including:

- **Construction phase:** The construction of the proposed development is anticipated to result in temporary disruptions to the surrounding area, which is a common and expected occurrence during development works. Anticipated disruptions may include construction traffic, and noise and dust emissions, as addressed under **Section 7.0** and mitigated by measures outlined in **Appendix C**.
- **Operational phase:** The operation of the proposed development will result in inevitable changes to the local area that may be perceived as negative. Traffic impacts, including increased vehicle movements, are anticipated to be the most significant impact for the local community.

Impact Assessment and Mitigation

To assess the positive and negative social impacts of the proposal, an impact assessment and mitigation matrix has been provided within **Table 15** below. The matrix has provided a rating to each identified impact as follows:

Table 15 Matrix Rating

Positive Rating	Justification
High positive	Where the proposed development is expected to deliver significant social benefits
Medium positive	Where the proposed development is expected to deliver moderate social benefits
Low positive	Where the proposed development is expected to deliver minor social benefits
Negative Rating	Justification
Low negative	Where the proposed development is expected to result in minor adverse effects
Medium negative	Where the proposed development is expected to result in noticeable adverse effects
High negative	Where the proposed development is expected to result in significant adverse effects

Table 16 Impact assessment and mitigation matrix

Impact and Mitigations (if required)	Residual significance
Who will benefit?	
Way of life	
The proposed development provides residential accommodation in a space which is already serviced by public transport. The existing transport infrastructure will allow for future residents to access employment opportunities and services in centres such as Bankstown, Burwood and Miranda.	Medium positive
The proposed development includes the provision of three embellished public open spaces, which will ultimately shape the way that existing and future residents play. These spaces will: • Include appropriate heritage interpretation items to solidify the Aboriginal and European heritage significance of the site. • Foster greater social interaction, supported by a diverse range of spaces within the public areas. • Encourage use of active transport, through the provision of shared paths and bicycle storage infrastructure.	High positive
Community	
The delivery of housing will attract residents from diverse demographics including age and culture, and will contribute to a more inclusive and vibrant community. With consideration of the high density development occurring in Bankstown's primary centres, the proposed development will facilitate the maintenance of housing diversity in the LGA through the provision of a large number of low density dwellings. This will support social diversity and intergenerational living, and promotes stability and inclusivity, further strengthening a resilient and supportive community.	Medium positive
The proposed development includes the provision of open spaces, an extensive street tree network and conservation of the C2 zoned land. These considerations will ultimately contribute to the project's overall resilience and sustainability, and therefore contributes further to intergenerational equity.	Medium positive
Accessibility	
The proposed development benefits from a public transport network which provides access to centres such as Bankstown, Burwood and Miranda. The nearest train line is the T8, accessible via East Hills, Panania, and Revesby stations to the south and the T6 line to the north at Bankstown Station can also be reached via bus from the site. The site is also within walking distance to key	Medium positive

infrastructure, including schools and open space, and will encourage active travel by providing shared paths and bicycle parking infrastructure.	
Culture	
The project incorporates elements which will help in preserving and conveying the historic Aboriginal significance of the site. The HIP (refer Appendix S) provides recommendations for the implementation of heritage interpretation items in the proposed green open spaces, which will further strengthen the site's ongoing connection with First Nations People.	High positive
Health and wellbeing	
The provision of green open space will foster an improved mental wellbeing of future residents. These spaces will allow for greater social interaction for those vulnerable to social exclusion, encouraging neighbouring residents to have a sense of community.	Medium positive
The proposed development will enable active modes of transport through the provision of shared paths, with an upgraded public domain improving the walkability of the site and a sufficient provision of bicycle parking in proposed open spaces. The site's accessibility will greatly benefit both residents and visitors of the site.	Low positive
Surroundings	
The proposed development will significantly improve the existing conditions of the site, revitalising a previously under-utilised university site into a residential development that will serve current and future Milperra residents. The design of the proposal enhances the aesthetic value of the site, with carefully selected materials and finishes to create a visual interest within this emerging space.	Medium positive
With a significant increase in trees and vegetation across the site, as well as the conservation of the C2 zoned land, the proposal will improve ecosystem services such as shade and pollution control, greatly benefiting the local community and ecosystem. Additional measures to mitigate climate impacts will also be introduced on site, as detailed within the ESD Report (Appendix M).	High positive
Who will be negatively impacted?	
Accessibility	
The surrounding community will notice a minor increase in traffic during peak hours, as addressed within Section 7.6, however will remain within acceptable levels of service within the relevant guidelines. During construction, temporary disruptions to traffic, site access and pedestrian activity are expected. Mitigation: A Preliminary Construction Pedestrian and Traffic Management Plan (CPTM) has been prepared by TTPP (Appendix V). A Detailed CPTM will be prepared, subject to development approval.	Low negative
Surroundings	
Temporary noise emissions are expected during construction which may be disruptive to adjacent properties and the local community. The Noise Impact Assessment (Appendix W) concluded that this can be appropriately managed. Mitigation: A detailed construction management plan will be prepared prior to the commencement of construction and will specify noise and vibration management measures.	Medium negative
An increase in anti-social behaviour may negatively impact community perceptions of safety. The proposed development has addressed this by implementing strategies and CPTED principles to improve community perception. Mitigation: Implementation of the mitigation measures identified in the CPTED Assessment Report (refer Appendix JJ) and outlined in Section 7.13.	Low negative

As such, while some negative social impacts may occur as a result of the increase in traffic volume to the site and during the construction phase, the positive social impacts result in a net positive impact of the proposed development demonstrating that the proposed development has acceptable social impacts.

8.0 Project Justification

Considering the assessment of impacts above, this section provides an overarching justification and evaluation for the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

8.1 Project Design

As addressed in **Section 4.0**, the project will be delivered in stages and comprises the construction of 62 dwelling houses, three (3) public parks, new roads and shared paths, civil infrastructure, a car park, and the management of conservation land. Specifically, consent is sought for:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of 62 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Residential superlots, infrastructure lots, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

The proposed development intends to stitch the site together with the existing low density residential development to the west and create appropriate interfaces between the residential development and the general industrial uses to the north and east. The provision of 62 homes, and superlots to provide a further potential 368 dwellings on the site. Further detail on the proposed development is available in Sections 4 and 7 of this EIS, and the Architectural Drawings prepared by Mirvac Design (refer **Appendix G**), as well as the Landscape Architecture Report and Plans (refer **Appendix H** and **G**, respectively).

8.2 Strategic Justification

As detailed within **Section 3.0** of this EIS, the proposal is directly aligned with the relevant strategic planning framework, as summarised below:

- **Housing Supply:** The proposed development aligns with key strategic frameworks at the federal, state, and local levels by significantly contributing to the housing supply within the City of Canterbury Bankstown LGA and across NSW. When fully delivered, the development has the potential to provide up to 430 new dwellings on the site. Importantly, this contribution will occur within the Housing Accord period, supporting current state and federal initiatives to boost housing availability and meet population growth targets.
- **Housing Diversity:** Given the strong demand for housing within the Housing Accord period, many large-scale projects are being delivered as high-density residential developments. In contrast, the proposed development will enhance housing diversity within the LGA by introducing large-scale, low-density residential accommodation. This will broaden the range of housing typologies available across both the LGA and NSW. Importantly, the proposed scale and form of development are well-suited to the surrounding residential character, ensuring an appropriate and contextually sensitive outcome.
- **Liveability:** The proposed development will deliver a high level of amenity for future residents through the integration of social infrastructure and the provision of housing within close proximity to public transport services. Importantly, it will also enhance the amenity of the surrounding community by incorporating generous green open spaces that significantly improve public access and recreational opportunities. The proposed landscape design will further support a more walkable, connected, and liveable neighbourhood.

8.3 Statutory Justification

A detailed assessment against the statutory planning context of the proposed development is provided in **Section 5.0** of this EIS, which confirms that the proposed development is permissible with consent and generally complies the relevant

statutory requirements of the relevant SEPPs and the Canterbury Bankstown LEP 2023 and other relevant environmental planning instruments.

8.4 Community Views

This proposal has been subject to significant engagement with key government agencies including Council, Transport for NSW and Ausgrid, in addition to the local community and key stakeholders. The detail of this engagement is provided within the Engagement Report provided at **Appendix BB** and **Section 6.0** of this report.

In summary, the consistent feedback received during the consultation was in relation to:

- Traffic / Parking / Public Transport
- Footpaths
- Parks
- Homes
- Retail
- Construction

8.5 Likely Impacts

In accordance with the SEARs, the EIS has undertaken a detailed assessment of the scale and nature of the likely environmental, social and economic impacts of the proposed development, including cumulative impacts.

Environmental Impacts

The EIS has considered all potential environmental impacts of the proposed development, including:

- Built Form and Urban Design
- Visual Impacts
- Public Domain and Landscaping
- Tree Removal
- Sustainability
- Traffic, Transport and Accessibility
- Crime Prevention Through Environmental Design
- BCA and Accessibility
- Noise and Vibration
- Biodiversity
- Water Management and Flooding
- Contamination and Remediation
- Aboriginal Cultural Heritage
- Waste Management
- Built and Archaeological Heritage

The assessment concludes that the proposed development will not result in any adverse impacts and where any impacts are posed, mitigation measures have been identified, which are summarised in **Appendix C**.

Social Impacts

There are a number of positive social impacts and benefits of the proposed development including:

- The proposed development will significantly increase the housing stock within the Canterbury Bankstown LGA, with a particular emphasis on delivering detached dwelling houses. This is notable, as large-scale residential developments in the LGA are typically characterised by high-density housing, making the provision of a substantial number of low-density dwellings a rare and valuable contribution to housing diversity in the LGA.
- The proposed development is sensitive towards the heritage significance of the locality, maintaining significant consideration of the area's historic significance regarding Aboriginal occupation and then as the Milperra Soldier Settlement.

- The proposed works improve access to social infrastructure, public transport, and local services for the locality as a whole, and subsequently promotes social inclusion by creating a more walkable and connected neighbourhood. Furthermore, it strengthens the local community by fostering opportunities for social interaction in shared spaces.
- The proposed permeability of the site improves safety and accessibility through shared paths.
- The proposed development enhances the overall liveability and amenity of the area through high-quality urban design and landscaping.

Economic Impacts

A summary of the economic impacts of the proposed development is provided below:

- The proposed development is expected to generate up to 106 jobs in the construction phase. Additionally, the development of the non-residential portion of the works will aid in providing additional local employment opportunities during the operational phase.
- The construction of the proposed development supports local businesses and suppliers through demand for materials, services, and labour.
- The increase in population will boost demand for retail, hospitality, and community services.
- The proposed development will contribute to the local area through the application of the Canterbury Bankstown Contributions Plan and the VPA.

8.6 Principles of Ecologically Sustainable Development

The EP&A Regulation lists four (4) key principles of ESD which must be considered in assessing a project. **Table 15** below provides an assessment of the proposal's impact against these principles. The assessment is informed by the ESD Report prepared by Green Rate, included in this EIS as **Appendix M**.

Table 17 Assessment against ecologically sustainable development principles

Principle of ESD	Assessment
The Precautionary Principle	The project adopts a proactive approach to climate resilience and ecological protection, applying the precautionary principle at all stages of planning and design. Potential sustainability risks, including climate change impacts, increasing heat stress, and resource scarcity, have been assessed early, leading to adaptive design responses. These include enhanced urban canopy coverage, water-sensitive urban design (WSUD) systems, thermally efficient building envelopes, and renewable energy integration. This "no regrets" strategy ensures that preventative measures are embedded in infrastructure and landscape design, safeguarding the site against future environmental uncertainty.
Intergenerational Equity	The WSU Milperra development has been planned with a clear emphasis on long-term sustainability and equity for future generations. Each dwelling is designed as an all-electric, high-performance home that reduces operational emissions and energy demand. Additionally, proposed public open spaces provides multi-generational facilities. Conservation zones preserve and rehabilitate the remnant Cumberland Plain Woodland, maintaining biodiversity and ecological integrity. Through these initiatives, the project contributes to a lasting environmental legacy, ensuring that future residents inherit a healthy, productive, and resilient community.
Conservation of Biological Diversity and Ecological Integrity	More than 2 ha of Cumberland Plain Woodland will be conserved and actively managed as part of the project's environmental stewardship commitments. The landscape strategy enhances biodiversity through endemic planting, ecological restoration, and habitat creation. Habitat logs, pollinator corridors, and native tree species will strengthen local ecosystem connectivity. These measures ensure that conservation values are not only protected but integrated into the urban environment, reinforcing the site's ecological integrity and contributing to regional biodiversity outcomes.
Improved Valuation, Pricing and Incentive Mechanisms	The project recognises the economic and social value of environmental stewardship by integrating efficient, low-emission design and renewable technologies that deliver measurable cost savings to residents and operators. By specifying long-lasting, low-maintenance materials, installing solar PV systems, and reducing reliance on fossil fuels, the development achieves ongoing financial and environmental efficiencies. This approach enhances asset value, supports future carbon-pricing readiness, and provides direct economic incentives for sustainable living.

8.7 Public Interest

The proposed development is considered to be in the public interest as it will unlock previously underutilised land for residential use, significantly boosting housing supply across the Canterbury Bankstown LGA. With the potential to deliver up to 430 additional low-density dwellings, the development presents a rare opportunity to enhance housing diversity at scale, while making a meaningful contribution toward meeting the Housing Accord target of 14,500 new homes for the LGA.

8.8 Suitability of the Site

The site is suitable for the proposed development for the following reasons:

- The proposed uses align with the land use zones approved for the site under Planning Proposal PP-2021-5837.
- The site is capable of being remediated to suitable standards for the proposed uses.
- Tree removal has been avoided, mitigated or managed through the detailed design of the subdivision.
- The subdivision and creation of a community title will enable the ongoing management of the C2 Environmental Conservation zoned land.
- The site has an appropriate interface with surrounding land uses that will ensure both future and existing residents in the site's vicinity do not experience any long term amenity issues.

9.0 Conclusion

This Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the residential development, at 2 and 2A Bullecourt Avenue, Milperra. This EIS has addressed the issues outlined in the SEARs Compliance Table (**Appendix A**) and is in accordance with Schedule 2 of the EP&A Regulations with regard to consideration of relevant matters.

This EIS has considered a range of issues (refer to **Section 7.0**) including statutory and strategic context, suitability of the site, community and stakeholder engagement, traffic and transport, urban and landscape design, visual impacts, noise and vibration, infrastructure requirements, Aboriginal cultural heritage, non-Aboriginal cultural heritage and archaeology, biodiversity, socio-economic impacts, ecologically sustainable development, waste and contamination.

Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of this project is justified for the following reasons:

- The proposed development is permissible with consent and is generally consistent with all relevant controls and standards including the Canterbury Bankstown LEP 2023 and Canterbury Bankstown DCP 2023.
- The proposed development will redevelop an under-utilised site within Milperra and transform the site into a residential neighbourhood development that maximises the capacity of the site to deliver much-needed low density housing.
- The development will not result in any adverse environmental impacts that cannot be appropriately managed through mitigation measures.
- The proposal is suitable for the site and is in the best interest of the public.

Given the merits described above, it is requested that the application is approved.