

10345 16 July 2010

Mr Sam Haddad Director General Department of Planning 22 - 33 Bridge Street SYDNEY, NSW, 2000

Attention: Mr Andrew Smith (Team Leader - Metropolitan Projects)

Dear Andrew

PART 3A REQUEST FOR MINISTER'S DECLARATION PROPOSED MIXED USE DEVELOPMENT, CORNER OF HERRING ROAD AND EPPING ROAD, MACQUARIE PARK 'STAMFORD GRAND NORTH RYDE'

We write on behalf of Stamford Property Services (the proponent) regarding a Concept Plan and first stage Project Application for a residential / mixed use development at the northern corner of Herring Road and Epping Road, Macquarie Park.

The purpose of this letter is to seek a declaration in accordance with s75B(1) of the *Environmental Planning & Assessment Act, 1979* (the EP&A Act) that the Proposal is a project to which Part 3A of that Act applies. We also seek the Minister's authorisation of a Concept Plan and Stage 1 Project Application (PA) for the proposal under s75M (3A) of the EP&A Act.

Should the Minister form the above opinion and authorise the submission of a Concept Plan and first stage PA, we request that the Director General issue the requirements as to the level and scope of the necessary documentation and assessment to facilitate the preparation of an Environmental Assessment (EA) to accompany both applications.

To support the request for the Director General's requirements relating to the EA, this letter also forms a Preliminary Environmental Assessment relating to the project. The Preliminary Environmental Assessment Report (PEAR) provides detail on the site location and an outline of the project, and identifies the key likely environmental and planning issues associated with the proposal.

This correspondence is accompanied by:

- Development Concept for the proposed Concept Plan prepared by Allen Jack + Cottier (Appendix A).
- Summary of Project Calculations prepared by Allen Jack + Cottier (Attachment B)
- Quantity Surveyor Summary Certificate prepared by Page Kirkland (Appendix C).

1.0 THE SITE AND CONTEXT

The proposal is positioned on the site known as 110 – 114 Herring Road, Macquarie Park and is legally described as Lot 1 DP 780134. The land is owned by HSH Hotels (Australia) Ltd as Trustee for SNR Trust. The site is located within the north-west portion of the Macquarie Park Corridor (within the City of Ryde LGA) between the M2 Motorway and Epping Road, as shown in the Site Location and Local Context analysis prepared by Allen Jack + Cottier at **Appendix A** and **Figure 1**.



Figure 1 – The site and surrounding area (Source: Allen Jack + Cottier)

The site has an area of approximately 22,433m² and is currently occupied by the Stamford Grand Hotel, mainly comprising 3 storey hotel accommodation buildings. It is bounded by Herring Road to the south east, Epping Road to the south west, with medium density residential development to the north east and a retirement village to the north west. Macquarie University is situated approximately 200 metres north of the site.

Stamford considers the site as a significant opportunity for residential development and is strategically located in that it has close, convenient and direct pedestrian access to:

- Macquarie Park bus/rail interchange;
- bus stops on Epping Road;
- Macquarie Centre and its regional shopping and entertainment facilities;
- Macquarie University and Research / Business Park; and
- employment opportunities in the broader "Global Arc" as defined in the Sydney Metro Strategy.

The immediate area around the site is largely typified by residential apartment development, university uses and the Macquarie Park Business Park. The Macquarie Park Corridor is a major component of Sydney's Global Economic Corridor and comprises Macquarie University and Research Park, Macquarie Park Shopping Centre, residential precincts and business parks uses.

The Epping to Chatswood railway line runs through the area and Macquarie University Station is situated at the corner of Herring and Waterloo Roads, approximately 650m to the north east of the site. In addition, the site is well serviced by buses with services connecting the locality to the CBD, Parramatta and town centres throughout the region.

The proposed development is on a generally unconstrained site in single ownership. As shown in **Figure 2** there is a limited availability of sites in single ownership for residential in the Macquarie Park corridor, with the opposite side of Herring Road identified by Ryde Council for uplift, being predominantly within strata title ownership. Given the site's single ownership, planning and future development may proceed without the requirement for the coordination of multiple site owner's or conflicting development designs.



Figure 2 – Surrounding residential sites, capacity for change (*Source: Allen Jack + Cottier*)

In general, the existing residential development which typifies development within the Herring Road precinct does not reflect Council's long term intention and aspirations for the future capacity of the area by providing housing close to jobs and transport. By creating new residential apartment opportunities within Macquarie Park, the proposal will contribute to achieving the following actions as outlined in the Metropolitan Strategy:

- C2 plan for a housing mix near jobs, transport and services;
- D3 influence travel choices to encourage more sustainable travel.

and the Inner North Subregional Strategy:

- C1 Ensure adequate supply of land and sites for residential development;
- C2 Plan for a housing mix near jobs, transport and services; and
- C5 Improve the quality of new development and urban renewal.

2.0 THE PROPONENT AND ARCHITECTURAL TEAM

2.1 The Proponent

The proponent for the development is Stamford Property Services. Whilst Stamford Hotels and Resorts are well known for their hotel accommodation operation, Stamford Property Services is a successful property development arm of the company that has delivered high quality residential and commercial development from design development through to completion of construction. Examples include:

- 161 Kent Street, Sydney Stamford Margue (completed 2006);
- Stamford on Kent Caltex House (completed 2000);

- Stamford Residences and Reynell Terraces, Gloucester Street, the Rocks (completion due mid 2011);
- Stamford Cosmopolitan Centre, Double Bay (completed 2010); and
- Dynons Plaza Hay Street, Perth (completed April 2010).

Photomontages of these examples are provided in the appended Allen Jack + Cottier document (Attachment A).

2.2 Architectural Team

Due to the desire to create high quality residential accommodation on the site to take advantage of the site's location, orientation and aspect, Stamford Property Services have appointed Allen Jack + Cottier Architect's (AJ + C) to prepare the development concept for the site. AJ + C is a leading Australian architectural practice. Notable examples of their award winning residential architecture are listed below and are provided in the appended Allen Jack + Cottier document (Attachment A), including:

- The Village , Condamine Street, Balgowlah;
- Rouse Hill Town Centre (in association with Group GSA and Rice Daubney);
- Bullecourt, Harris Street, Ultimo;
- Moore Park Gardens, East Redfern; and
- The Hudson, Botany Road, Alexandria

3.0 THE PROJECT

3.1 Concept Plan

The proponent is seeking approval for a Concept Plan for principally residential development with limited mixed uses, as shown in the appended AJ+C document (Attachment A). It is anticipated that there would be some retailing floor space at ground level to support activation at street level and a potential childcare centre to support the proposed residential uses. Access to the site is anticipated off Herring Road with the main address and frontage of the development to Herring Road. For the purposes of the Concept Plan, the site will be broken up into four development precincts. The anticipated scope of development that would result from the Concept Plan approval is shown in Table 1 below:

	Site A	Site B	Site C	Site D	Overall
Proposed primary land use	Residential	Residential	Residential	Residential/Retail	Residential
Maximum Height	13 storeys	9 storeys	13 storeys	21 storeys	21 storeys
Indicative GFA	12,237 m²	9256 m²	14,816 m²	19,514 m ² residential 212m ² retail	56,035 m²
Indicative Number of Units	136	60	166	217	625
					FSR 2.5:1

Table 1 – Summary of Key Development Parameters

A summary of Project Calculations for the Concept Plan is included at Attachment B.

3.2 First Stage Project Application

The first stage Project Approval seeks approval for two buildings within "Site A". The design prepared by Allen Jack + Cottier provides the following parameters:

- A maximum of 13 storeys;
- A Gross Floor Area of approximately 12,237m²;
- Approximately 136 apartments;
- Approximately 192 parking spaces; and
- A mix of apartment types, including studio, 1, 2 and 3 bedroom apartments.

3.3 Urban Design Rationale

A preliminary urban design rationale and analysis of the proposed Concept Plan envelopes is provided at the Key Issues for Consideration (Section 5.2 – Urban Design) of this PEAR.

4.0 MAJOR PROJECTS SEPP 2005

Clause 6 of the Major Projects SEPP provides that development that, in the opinion of the Minister, is development of a kind referred to in Schedule 1 (Classes of development) and Schedule 2 (Specified sites) is declared to be a project to which Part 3A of the EP&A Act applies.

Clause 13 of Schedule 1 of the Major Development SEPP identifies the following developments as being Part 3A Major Projects:

Group 5 Residential, commercial or retail projects

13 Residential, commercial or retail projects

(1) Development for the purpose of residential, commercial or retail projects with a capital investment of more than \$100 million.

The proposal has a Capital Investment Value in excess of \$175 million (based on an estimate prepared by Page Kirkland), and is well in excess of the \$100 million threshold. We have appended a Quantity Surveyors Summary Report to this letter (**Attachment C**).

Whilst the project would automatically qualify as a Major Development, we have also prepared a strategic justification for the proposal, articulating its relative merits in achievement of various local, sub-regional and State planning objectives.

We have applied the Department's previous guidelines applicable at the time when Clause 13 projects were subject to discretionary decision-making. We trust that this assists in determining that the project will contribute to meeting State or regional planning objectives. Those criteria relevant to this proposal are discussed below:

Criteria A – Local Impediments to Urban Renewal

Is the development within a centre or urban renewal area nominated for growth in the Metro Strategy or a regional or sub-regional strategy?

Metropolitan Strategy and Draft Inner North Subregional Strategy

The strategic planning basis for growth within Macquarie Park Corridor is set out in the Metropolitan Strategy and the draft Inner North Subregional Strategy. The Metropolitan Strategy

sets a housing stock target of an additional 30,000 dwellings within the Inner North Subregion by 2031, including 12,000 dwellings within the Ryde LGA. The Strategy also sets a target of over 22,500 jobs to be created in Macquarie Park by 2031. Accordingly, the majority of land, excluding the university within Macquarie Park, is zoned B3 (Commercial Core) or B7 (Business Park), where residential development is prohibited. The proposed development is situated on land zoned B4 (Mixed Use) and is identified in the Inner North Subregional Strategy as having a current housing density of 9 – 12 dwellings per hectare. The importance of accommodating residential growth in established areas is highlighted in the Metropolitan Strategy where a target of 60-70% of new growth in established areas is required, compared to 30-40% in new release areas. As such, the proposed development presents an opportunity to increase the housing density in one of the few areas within Macquarie Park, in proximity to the station, where this type of development is permissible.

Macquarie Park itself is nominated as a Specialised Centre under the State Government's Metropolitan Strategy and the northern anchor of the Global Economic Corridor, which stretches from Sydney Airport and Port Botany to Macquarie Park. The Global Economic Corridor accommodated about 700,000 jobs in 2001 and this is expected to grow to 850,000 by 2031.

In the urban hierarchy within the Inner North Subregion, Macquarie Park sits below North Sydney (Global City) and Chatswood (Major Centre) and alongside St Leonards as a Specialised Centre. Specialised Centres are expected to perform a vital economic and employment role which will generate metropolitan-wide benefits. The proposed development complements the significant amount of commercial development that is planned in the area, by allowing a greater number of residents to live closer to their place of work. The proposed residential development is ideally situated to take advantage of the excellent public transport links provided. The increased amount of residents will strengthen the viability of the new Chatswood – Epping rail link and supports the objective of the Metropolitan Strategy to plan for a housing mix near jobs, transport and services and the objectives of the State Plan to provide more jobs closer to home.

Current Zoning and Development Control Context

The site is currently zoned B4 (Mixed Use) under Ryde LEP 2010 (See **Figure 3**). This zoning permits *'Multi dwelling housing'* as an innominate use. The proposal is permitted with consent under the zone. The proposal would also generally satisfy the zoning objectives by providing some limited ground floor retail uses and childcare centre facilities. Under the Ryde LEP 2010, the current development controls shown in **Figures 4** and **5**, include:

- a 15.5 metre height limit for the site (approximately 3 storeys); and
- an FSR of 1:1



Figure 3 - Current zoning of the site (Ryde LEP 2010)



Figure 4 - Current Height Controls of the site (Ryde LEP 2010)



Figure 5 - Current FSR Controls of the site (Ryde LEP 2010)

Whilst the proposal is permitted in terms of land use, development of a scale and standard commensurate with meeting the relevant strategic planning objectives (including the Metropolitan and Sub-regional Strategies) cannot be achieved under the development controls applicable to the site, thus preventing any viable redevelopment option.

The site is included in the current draft Ryde LEP 2008 (Amendment 1) which deals with the Macquarie Park Corridor. Ryde Council and the Department of Planning are still in the process of resolving issues with the LEP Amendment which is yet to be formally publicly exhibited. The draft Amendment 1 was, however, informally exhibited at the time of the exhibition of the then draft City of Ryde Macquarie Park Corridor DCP in early 2008. Whilst the DCP was adopted in June 2008 and came into effect on 1 July 2008, LEP Amendment 1 remained unresolved. The Macquarie Park DCP references controls reliant on Amendment No. 1, without the parent draft LEP amendment having been gazetted.

The main issue for the delay of Amendment 1 appears to be centred on the application of floor space bonuses via incentives in addition to the payment of section 94 contributions. It would appear that the resolution of this matter and other technical issues means the draft LEP would be some time from gazettal. A project of this scale and strategic importance can clearly not wait for these issues to be resolved when a valid assessment and approval pathway is available.

Council is acutely aware of the need to revise its current controls to allow for development to match strategic planning objectives. To this end Council sought to provide for increased height and FSR controls in Ryde LEP 2008 Amendment No. 1. The relevant draft controls are shown in **Figures 6** and **7**. These controls are drawn from the draft version that was informally exhibited with the draft comprehensive LEP and include:

- a part 29.2 metres, part 36.8 metres and part 52 metres height limit across the site; and
- an FSR of 2:1.



Figure 6 - Proposed height controls (draft Ryde LEP 2008 (Amendment 1) February 2008 version)



Figure 7 - Proposed FSR controls (draft Ryde LEP 2008 (Amendment 1) February 2008 version)

Whilst it is clear that it is Council's intention to intensify development on the site, the above controls rely heavily on a system of FSR incentives which is one of the reasons, preventing the LEP from being finalised.

Development on the site under its current controls would not fulfil the development potential of the site and would be inconsistent with the broader strategic aims. This would result in an underdevelopment of the site which would, relative to land values, render it economically unviable. The proposed planning controls would also fail to provide a development that would achieve a desired built form in proximity to the station, transport interchange and regional shopping facilities. The proposal therefore has the potential to be stalled and frustrated by local planning controls unless the proposal is allowed to proceed under Part 3A of Act.

Does the Council have the resources to assess and determine major projects?

We understand that Council does have the resources to deal with the application, however by virtue of the development's CIV of over \$175 million it is a project to which Part 3A of the EP&A Act applies.

Do Council practices demonstrate that projects important to implementing Metro or regional strategies can be determined on their merits?

As discussed above, we believe that Council is committed to and is actively seeking to encourage growth in Macquarie Park and particularly on the site due to its strategic location in proximity to Macquarie Park Station at the key intersection of Epping Road and Herring Road. As stated above, whilst Council may have resources to deal with such an application, the capital investment value of the project means it is a project to which Part 3A applies.

Criteria B – Facilitate Housing or Job Growth

Will the development directly result in significant growth in housing choice?

The proposal will increase the number of apartments in Macquarie Park by up to 600 dwellings. According to ABS census data, Macquarie Park had a total of 4130 dwellings in 2006. This equates to an increase of around 14.5% in the number of dwellings. Further, this will contribute 5% of the total new dwellings the City of Ryde is expected to provide under the provisions of the Draft Inner North Subregional Strategy over the next 20 to 25 years. The proposal is a significant contribution and catalyst to drive this form of growth. Additionally, it is anticipated that the construction of the development will create a significant number of construction jobs.

The market positioning and projected price point of the residential apartments will enable the proponent to attract a wide variety of purchasers including young professionals, first and second home buyers, investors, empty nesters and students. This will facilitate the establishment of a desirable social mix of households within the precinct to create a vibrant community. The higher density of the proposed development also provides a point of difference to the low density residential development predominant on the other side of Epping Road to the south and west.

Is the development in a centre identified in the Metro Strategy or Regional Strategy?

The development is within a 'Specialised Centre' in the Metro Strategy. It is also within Sydney's Global Economic Corridor.

Criteria C – Transport accessibility

Is the development readily accessible to the railway, bus stop with frequent service, transit way station or ferry wharf? As an example within 800 metres from a station or transport node?

The portal to the Macquarie Park train station is located 650 metres to the north east of the site and it is therefore anticipated that the development will achieve a high public transport modal share by rail. The proposal supports the objectives of the NSW State Plan 2010, which aims to increase the percentage of the population living within 30 minutes by public transport of a city or major centre in Metropolitan Sydney.

5.0 KEY ISSUES FOR CONSIDERATION

The key environmental issues for consideration are as follows:

- Zoning and Development Controls
- Urban Design
- Proposed Uses and Reduction in hotel accommodation
- Landscaping, Streetscape and Public Domain
- External Impacts
- Internal Amenity
- Traffic and Access
- Construction Management
- Infrastructure and Services
- Contamination
- Overshadowing
- Noise
- Flooding
- Wind Impact
- Environmental Sustainability
- Site Suitability

These issues are discussed in more detail in the following sections.

5.1 Zoning and Development Controls

Whilst the proposal is permissible under the current LEP controls, it does not generally comply with or satisfy the relevant height or FSR controls that currently exist or are proposed. A review of the constraints of existing controls was outlined at **Section 4**.

The Environmental Assessment Report (EAR) will provide a detailed assessment of the proposal's compliance with the draft planning controls, City of Ryde DCP 2008 (Macquarie Park Corridor), the Metropolitan Strategy and the Inner North subregional strategy and other strategies. It will also provide suitable urban design and planning justification for any departures from these standards and controls.

5.2 Urban Design

The EAR will analyse the proposed built form and outline how the proposed building envelopes are a suitable urban design outcome for the site and context. The EAR will provide an urban design / visual impact assessment which will:

- analyse the scale, height and massing of the proposed building envelope in the context of Ryde Council's strategic planning documentation and recent Part 3A proposals (i.e. Macquarie University Concept Plan and the Lipman Part 3A Proposal (MP09-0915));
- identify overshadowing of the proposed building envelopes; and
- outline the ability of the proposed building envelope to provide a landmark building with a high level of architectural merit.

A preliminary analysis reveals the proposed built form and scale is appropriate given the site's context as:

- high density residential apartments are appropriate for the site, which is located within 650 metres walk from Macquarie University railway station;
- the site is one of the few consolidated development sites within Macquarie Park, in close proximity to the station that can accommodate residential development;
- the proposal will provide up to 600 new high quality residential dwellings that will contribute the subregional housing stock targets of an additional 30,000 dwellings within the Inner North Subregion by 2031, including 12,000 dwellings within the Ryde LGA;
- the scale of the proposal will strengthen the streetscape and is in line with Council's desire to situate prominent buildings at major entrances to Macquarie Park. The City of Ryde DCP identifies a strong corner element on this site, albeit lower in height. The proposal will contribute to creating a strong streetscape along Epping and Herring Roads, with Herring Road the major north south axis to the Macquarie University Precinct, framing the entry to punctuate the 'sense of arrival' through distinct urban form that frames the Herring Road street vista. The proposal will also complement the Macquarie University Concept Plan with the creation of a strong corner element (21 storeys), creating a 'book end' to the taller buildings approved in the Macquarie University Concept Plan on the northern end of Herring Road.
- the proposal presents an opportunity to achieve a greater land use balance within the Macquarie Park Corridor. The significance of achieving a land use balance with other uses in the corridor needs to be considered in the context of the substantial amount of future planned commercial and educational teaching floor space in addition to the large office precinct and university campus that already exists within Macquarie Park. The residential uses will support the surrounding education and commercial areas.
- the orientation of the site is such that the majority of overshadowing will fall across Epping Road rather than residential uses.
- the proposed development also, responds to recent projects in the area which have sought to
 increase height and FSR built form in the locality, commensurate with their access to the
 Macquarie University railway station. Recent existing approved and proposed developments in
 the locality demonstrate that a transformation in height and densities in the immediate area has
 begun to occur.

5.3 Proposed Uses and Reduction in Hotel Accommodation

The proposed development is predominantly residential, with a small amount of retail space at ground level to assist in street activation. Any retail activity will be small scale and provide a point of difference to the offering available within the Macquarie Shopping Centre. It is expected that the removal of the Stamford Grand Plaza and the impact this may have upon the amount of hotel accommodation available may be raised during the assessment period. A preliminary assessment of the five closest hotels suggests there is a total of 560 hotel rooms in close proximity to Macquarie Park. The EAR assessment will address the suitability of existing hotel accommodation in the locality to service the needs of the business park, taking into account the reduction of hotel rooms from the removal of the Stamford Grand (256 rooms).

5.4 Landscaping, Streetscape and Public Domain

In order to demonstrate how the proposed development will improve upon the existing level of activity at ground level and pedestrian permeability to and within the site, the application will provide an indicative streetscape, landscape and public domain plan with an appropriate level of detail applicable for a Concept Plan and first stage PA. The plan will include details of:

- street frontage design and setbacks;
- communal open spaces;

- streets and public open spaces (including a potential pocket plaza at Herring Road);
- ground floor active uses;
- vehicular access; and
- details to ensure a high quality public domain including new streets, interface with buildings and detail relating to the Herring Road and Epping Road streetscape.

5.5 External Impacts

Given that the site adjoins residential uses, we expect that amenity impacts will be an issue in the assessment of the application. As such the environmental assessment will address issues of acoustic and visual privacy, solar access, wind, views and construction impacts.

With regard to the surrounding residential buildings, particular impacts that will need to be managed relate to overshadowing, the staging of construction and adjustment of levels where relevant. The level of detail proposed will be commensurate with detail applicable to a Concept Plan and first stage PA. We note that due to the orientation of the site, the majority of the overshadowing will fall across Epping Road rather than the neighbouring residential uses.

5.6 Internal Amenity

The proposed development is envisioned to be built to a high standard in terms of internal amenity. The proposal will address the principles of State Environmental Planning Policy 65 (Design Quality of Residential Flat Development) and BASIX.

5.7 Traffic and Access

As the proposal involves the future reconfiguration of existing access to the site and an increase in GFA, it is expected that there will be additional traffic generation. Accordingly, the application will be accompanied by a Traffic Assessment prepared by a specialist traffic consultant. Specifically the assessment include:

- onsite parking requirements including provision of visitor car spaces;
- site access;
- impact of generated traffic upon the surrounding local and arterial road network, intersections and roundabouts; and
- opportunities to encourage public transport usage and modal shift.

5.8 Construction Management

A Construction Management Plan (and as relevant supplemented by the Statements of Commitments) will be submitted with the application which will deal with the following issues:

- demolition and construction staging;
- noise;
- air and water quality;
- demolition and construction waste;
- construction traffic management;
- pedestrian safety; and
- site management.

5.9 Infrastructure and Services

It is expected that the existing services on the site may need to be augmented to accommodate the new development. The Concept Plan will outline what services currently exist on the site and how these will need to be upgraded.

5.10 Contamination

Although the site is not expected to be contaminated, an environmental investigation will be submitted with the application which will satisfy the requirements of SEPP 55.

5.11 Noise

As the proposal involves the proposed construction of residential buildings, operational noise is not expected to be a significant issue. However, the development may be affected by noise generated by Epping Road located adjacent the site, therefore an acoustic report will be prepared to assess the impact of Epping Road on the development. The provisions of the Department of Planning's *'Development near Rail Corridors and Busy Roads'* Interim Guidelines will be considered. Again, the level of detail will be commensurate with that of a Concept Plan and first stage PA.

5.12 Flooding

During the meeting with the Department of Planning on 29 June 2010, it was queried as to whether the site was flood affected. The site does not contain any part of the Macquarie University Creek nor is the site shown as being flood affected on the Ryde City Council 1984 and 1990 flood simulation maps.

5.13 Wind Impact

The application will be accompanied by a Wind Impact Assessment which will demonstrate how wind impacts associated with the introduction of the new residential buildings will be mitigated and managed through the design and articulation of the building.

5.14 Environmental Sustainability

The proposed development will meet BASIX requirements, with scope for further environmental design principles to be adopted at a later stage. A suitably qualified ESD consultant will be engaged to advise and report on the ESD features of the project. Again, the level of detail will be commensurate with that of a Concept Plan and first stage PA.

5.15 Site Suitability

The site is considered suitable for the proposed development due to the following site opportunities:

- ownership and size of the site;
- close proximity to major public transport nodes including bus stops of Epping Road, Macquarie Park bus/rail interchange;
- location of the site in the Macquarie Park Corridor with access to employment and regional shopping/entertainment facilities; and
- current zoning of the site permits a mix of uses.

6.0 CONSULTATION

As requested in our meeting with the Department of Planning on 29 June 2010, a meeting has been organised with City of Ryde Council to discuss the proposal on 23 July 2010. The outcomes of this meeting will inform preparation of the Concept Plan and PA.

7.0 CONCLUSION

We trust that this Preliminary Environmental Assessment is sufficient to enable the Minister to form an opinion that the proposed development is a Major Project to be dealt with under Part 3A, authorise a Concept Plan submission and first stage Project Application, and to allow the Director General to issue requirements for the preparation of the necessary Environmental Assessment for both applications.

Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or cswan@jbaplanning.com.au.

Yours faithfully

Mre Swan

Clare Swan *Associate*

ATTACHMENT A

ATTACHMENT B

ATTACHMENT C