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URBIS

SCOPING REPORT

Leeds Street & Averill Street,
Rhodes – HDA Declared SSD

Prepared for
LEEDS INVESTMENT PTY LTD

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GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
CBCC	City of Canada Bay Council
CB LEP 2013	<i>Canada Bay Local Environmental Plan 2013</i>
DCP	Development Control Plan
DPIE	NSW Department of Planning, Industry and Environment
DSI	Detailed Site Investigation
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
HDA	Housing Delivery Authority
LEP	Local Environmental Plan
LGA	Local Government Area
PSI	Preliminary Site Investigation
RAP	Remediation Action Plan
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
SSDA	State Significant Development Application

1. INTRODUCTION

1.1. PRELIMINARY

This Scoping Report has been prepared on behalf of Leeds Investments Pty Ltd in support of a proposed mixed-use residential development (including affordable housing) at Leeds Street and Averill Street, Rhodes (**the site**). It seeks project-specific Secretary's Environmental Assessment Requirements (**SEARs**) for the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**) and concurrent rezoning application.

The site is located within the City of Canada Bay Local Government Area (**LGA**) and is located on land in Zone MU1 Mixed Use and Zone R4 High Density Residential under the provisions of the *Canada Bay Local Environmental Plan 2013* (**CB LEP 2013**). Development for the purpose of 'shop top housing' is permissible with consent within the MU1 (Mixed Use) zone and 'residential flat buildings' in Zone R4 High Density Residential.

On 17 February 2025, the Minister for Planning and Public Spaces (**the Minister**), in pursuance of section 4.36(3) of the *Environment Planning and Assessment Act 1979* (**EP&A Act**), made an Order declaring the development on the site to be State significant development (**SSD**) for the purposes of the EP&A Act.

Part 2 of the State Significant Development Declaration Order 2025 included the following *Declaration of State Significant Development* for the specified development on specified land declared SSD:

(f) development specified in EOI application 229650 dated 8 January 2025 including development for the purposes of mixed-use development comprising a commercial premises and residential accommodation with provision for affordable housing at Averill Street and Leeds Street, Rhodes as identified in Schedule 6,

Figure 1 provides a map of the Schedule 6 Land at Averill Street and Leeds Street, Rhodes.

Figure 1 – Land at Averill Street and Leeds Street, Rhodes



The Minister is the consent authority for the proposal in accordance with section 4.5 of the EP&A Act. Accordingly, this Scoping Report is being lodged with the Department of Planning Housing and Infrastructure (**DPHI**) seeking Secretaries Environmental Assessment Requirement (**SEARs**) for the proposed development.

Figure 2 illustrates the locations of the site subject to the rezoning, Concept SSDA and Detailed SSDA.



This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

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

Descriptor	Proponent Details
Full Name(s)	Leeds Street Developments Pty Ltd
Postal Address	101/25 Angas Street, Meadowbank NSW 2114
ABN	40 601 966 036
Nominated Contact	Murray Donaldson, Director (Urbis) P: (02) 8233 9953 E: mdonaldson@urbis.com.au

1.3. SITE DETAILS

Table 2 provides the address and legal description of the land the subject of the proposed Concept SSDA and Stage 1 and Rezoning Application. The Order declaring the development on the site to be State significant development (SSD) includes other adjoining land. The proposal adopts the current planning framework for the adjoining land.

Table 2 – Site Details

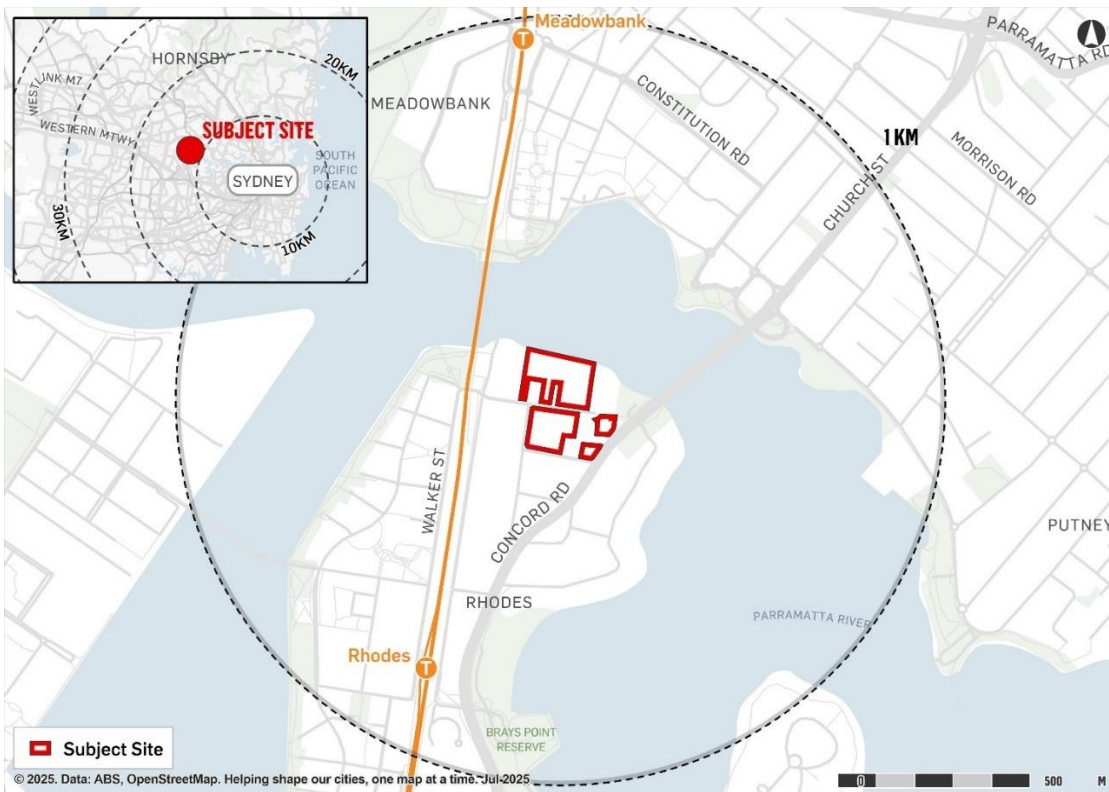
Descriptor	Site Details	Title Reference	Site Area	Stage
Address	7-9 Averill Street, Rhodes	12/543915	2,643	1
	11 Averill Street, Rhodes	1/236493	1,296	1
	8 -10 Leeds Street, Rhodes	51/544063	2,668	1
	12 Leeds Street, Rhodes	241/1194187	1,288	1
	14 Leeds Street, Rhodes	240/1194187	1,306	1
	16 Leeds Street, Rhodes	25/547306	1,498	1
	17 Leeds Street, Rhodes	10/239579	1,208	2
	23 Leeds Street, Rhodes	27/547201	7,379	2
	9-11 Leeds Street, Rhodes	1/717645	2,419	3
	13 Leeds Street, Rhodes	13/239579	1,208	3
	1 Averill Street, Rhodes	11/739491	1,180	4
	7 Leeds Street, Rhodes	28/547201	5,457	3
	2 Leeds Street, Rhodes	19/239579	1,733	4
	2A Leeds Street, Rhodes	18/239579	32	4
	(14 Lots in Total)		31,315	

Figure 3 –HDA Declared SSD Area and Proposed Concept SSD and Zoning Application Areas



A location plan and aerial photograph has been provided at **Figure 3** and **Figure 4** below.

Figure 4 – Location Plan



Source: Urbis

Figure 5 – Aerial Photograph



Source: Urbis

1.4. PROJECT OVERVIEW

The Leeds Street and Averill Street Precinct is set to redefine Rhodes as a dynamic waterfront destination. This landmark project will integrate public open spaces, high-quality housing and essential services into a vibrant mixed-use and residential area that delivers significant public open space and ensures continuous public foreshore access to a revitalised Parramatta River. The project will establish a strong physical and visual connection from Cavell Avenue to the foreshore, enhancing site legibility and permeability and encouraging strong pedestrian and site-through links to ensure seamless movement throughout the precinct and direct interaction with the water. Dedicated public open spaces with integrated amenities and improved connectivity will support community use and engagement and support the project vision of fostering a vibrant, healthy, inclusive and sustainable community.

Key features include:

- Over 2,000 new dwellings, addressing housing needs. An initial phase delivering over 1,000 dwellings by 2029, with potential for up to 1,500 dwellings.
- More than 16,000 sqm of public open space; to include new sports fields, an indoor swimming pool and a foreshore beach, boosting recreational opportunities.
- Continuous foreshore access to Parramatta River linking the Rhodes peninsula.
- The site lies within 800m of the Rhodes train station and 200m of the proposed ferry wharf (to be delivered by others), providing excellent access to public transport.
- Essential social infrastructure to support the growing population.
- Substantial 14,600 sqm retail provision

Billbergia, the parent company of Leeds Investments Pty Ltd, is one of Australia's leading property groups, developing and delivering transformative residential, commercial, retail and hospitality projects across Australia. They have a substantial network of successful residential and mixed-use developments across Sydney. Leeds Investments Pty Ltd have acquired the site with the intent to deliver high quality residential apartments with the inclusion of affordable housing, retail, leisure and hospitality in a strategic waterfront location.

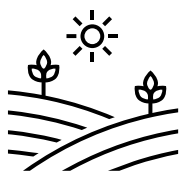
The vision for Leeds Street Masterplan Precinct is to foster a thriving community that improves the wellbeing and quality of life for both residents and visitors to Rhodes.

The proposed development aims to:

- Facilitate the delivery of high-quality housing, including affordable options, at a strategically located site to meet Commonwealth and NSW Government targets.
- Deliver architecture and design that is innovative and positively impacts the community with site through-site links and significant, high quality, public open spaces.
- Leverage the site's Parramatta River interface to provide waterfront views, foreshore access and a potential new ferry wharf (subject to Transport for NSW).
- Create employment opportunities through retail, leisure and hospitality spaces, aligning with Rhodes employment targets (and the Canada Bay LGA more broadly) to capitalise on engagement with the planned foreshore park and promenade.

This development will set a new standard for urban living in Rhodes.

The key outcomes sought are:



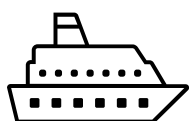
1. Active Public Open Space – A Shared Amenity

- Creation of an additional 13,500 sqm of publicly accessible open space and a high-quality sporting and recreation facilities.
-
- Co-location of new open space next to the proposed Rhodes Public School, creating a shared space for the new community and local students alike.



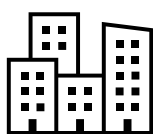
2. Continuous public foreshore access

- Delivers on plans for continuous public access to Parramatta River frontage.
-



3. Ferry Wharf

- Subject to confirmation by Transport for NSW facilitates access and useability for a new public ferry wharf at Rhodes.
-
- Public access ensured by unlocking private foreshore land ownership through considered development.
-



4. Additional housing in a well-located area

- Provision of an additional 2020 (approx.) high-quality dwellings, including affordable housing in an accessible location close to transport including rail, bus and future ferry services.
-

A detailed description of the key features of the site and locality is provided in

1.5. SITE DETAILS

Table 2 provides the address and legal description of the land the subject of the proposed Concept SSDA and Stage 1 and Rezoning Application. The Order declaring the development on the site to be State significant development (**SSD**) includes other adjoining land. The proposal adopts the current planning framework for the adjoining land.

Table 2.

1.6. PROJECT DESCRIPTION

Table 3 – Project Description

Key Element	Proposal
Concept Plan	The Concept Masterplan includes: ▪ Nine (9) residential building envelope towers ranging from 22 to 48 storeys, with 2,020 new apartments and 210,000 sqm of residential GFA. ▪ 15,020 sqm of non-residential GFA (retail). ▪ 16,325 sqm of public domain. ▪ Four (4) levels of basement beneath each stage for approximately 2,873 car parking spaces. ▪ Landscaping of public and private domains, including a foreshore park to be dedicated to City of Canada Bay Council (Council), with potential outdoor pool and manmade beach features, subject to further discussions with Council. ▪ Upgrades to the foreshore riverside boundary.

Key Element	Proposal
Stage 1 Development	- Private sporting fields. - Improvements to the interfaces of Leeds Street, Cavell Avenue, and Averill Street.
	Demolition of existing structures and excavation followed by the construction of 3 x mixed-use towers ranging from 33 to 48 storeys, which will accommodate up to 915 apartments, and 9350sqm of non-residential GFA (retail). Plus the provision of 5,600 sqm of public domain associated landscaping and approximately 1350 car parking spaces.
Planning Proposal	- Amend the maximum permitted building heights to 78m, 96m, 123m 135m and 150m and 170m. (Section 4.3 of CB LEP 2013) - Amend the minimum site area in the Leeds Street Character Area (Section 7.19 of CB LEP 2013) - Amend the minimum site area in the Leeds Street Character Area (Section 7.19 of CB LEP 2013) - Seek an exemption to the maximum number of dwellings in the Rhodes Precinct (Section 7.7 of CB LEP 2013) - Amend the FSR range to 4.3:1, 9.5:1, 10:1 and 10.8:1. (Section 4.4 of CB LEP 2013) - Amend the Foreshore Building Line (Section 6.4 of CB LEP 2013) - Amend the Minimum building separation and maximum floor areas above building podiums in Rhodes Precinct (Section 7.4 of CB LEP 2013) - Amendment to reduce the floor plate control of 750sqm (Section 7.4 of CB LEP 2013) - Overshadowing of public places in Rhodes Precinct (Section 7.3 of CB LEP 2013)
Affordable Housing	5% contribution towards affordable housing

Table 4 provides the proposed stages of the development including land uses and gross floor area (GFA), and factors in the development potential of adjoining land under current planning controls with an overall total of 2020 dwellings for the HDA declared SSD precinct.

Table 4 - Proposed Staging and GFA

Stage	Site Area sqm	Proposed GFA sqm	Units	Parking
1	10,669	106,546	834	1,353
1a		27,731	238	
1b		25,309	217	
1c		44,156	379	
Retail GFA		9,350		
2	11,003	21,157	188	334
2a		15,416	156	
2b		2,899	32	
Retail GFA		2,842		
3	11,003	59,391	573	796
3a		34,882	353	
3b		20,217	204	
3c		1,464	16	
Retail GFA		2,828		
4	9,781	41,013	425	446
4a		16,672	166	
4b		12,720	129	
4c		4,580	51	
4d		7,041	79	
Retail GFA				
Total	41,787	228,107	2,020	2,929

1.7. PROJECT BACKGROUND

The NSW Government has recognised the need to build more homes for the State's growing population, boosting housing supply and improving affordability.

Under the National Housing Accord, NSW is tasked with delivering approximately 376,000 new well-located dwellings, including approximately 15,800 social and affordable dwellings by 2029.

In January 2025, the NSW Government introduced the Housing Delivery Authority (**HDA**) to support the delivery of additional housing including affordable housing in well located areas. This brings together all levels of government, investors, and the private sector to unlock quality housing supply.

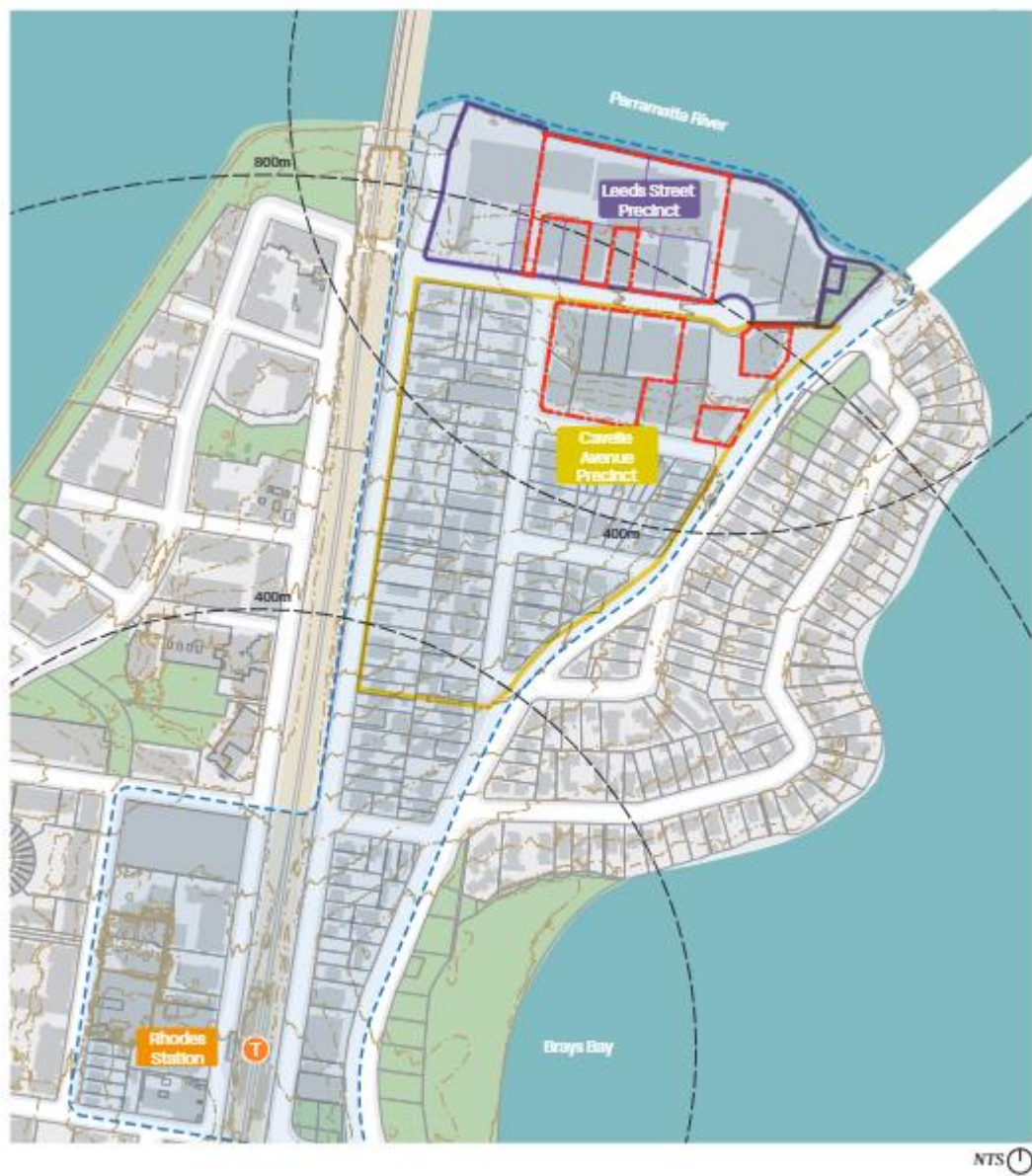
Billbergia is a leading property developer based in Australia who specialise in delivering high quality residential developments which can transform communities. As one of the leading residential property developers and construction companies in the Australian market, they are uniquely positioned to deliver much needed housing, including affordable housing, at the site.

Billbergia owns several sites across Rhodes that are strategically positioned: proximate to transport corridors and services that excellent access to employment centres and creational facilities close by – including:

- Concord Road / Homebush Bay Drive;
- Bennelong Bridge providing pedestrian, cycle and bus connectivity to Wentworth Point;
- The rail bridge across Parramatta River, which has parallel pedestrian and cycle connections that connects the Rhodes Peninsula with Meadowbank; and
- Pedestrian bridges providing east-west connectivity across the rail line.
- Rhodes Recreation Centre providing a 9,200 sqm community hub

Accordingly, with proximity to Sydney Olympic Park, associated facilities and surrounding parklands, the sites are readily able to deliver market and affordable housing in accordance with the recent NSW Government policy direction. Figure 2 and Figure 3 provide an overview of the site's locational amenity.

Figure 6 – Site Location (site marked in red)



Source: SJB

Figure 7 – Aerial Photograph of Site



Source: Urbis

Figure 8 – Key Movement Map



Source: SJB

2. STRATEGIC CONTEXT

This section describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project which will be explored in further detail within the future EIS.

2.1. PROJECT JUSTIFICATION

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

2.1.1. National Housing Accord

The National Housing Accord included an initial target to build one million new well-located homes over 5 years from mid-2024. The Commonwealth and states and territories agreed to update this target at National Cabinet in August 2023 to 1.2 million new well-located homes over 5 years from mid-2024. National Cabinet also endorsed the Commonwealth providing \$3.5 billion in payments to state, territory and local governments to support the delivery of new homes towards this target.

The National Planning Reform Blueprint includes:

- Updating state, regional and local strategic plans to reflect their share of housing supply targets.
- Undertaking planning, zoning, land release and other reforms, such as increasing density, to meet their share of housing supply targets.
- Streamlining approval pathways, including strengthened 'call in powers', and prioritising planning amendments to support diverse housing across a range of areas e.g. by addressing barriers to subdivision for appropriate medium density housing.
- Promoting medium and high-density housing in well located areas close to existing public transport connections, amenities and employment.
- Reforms to support the rapid delivery of social and affordable housing.
- Reforms to address barriers to the timely issuing of development approvals.
- Consideration of the phased introduction of inclusionary zoning and planning to support permanent affordable, social and specialist housing in ways that do not add to construction costs.
- Rectifying gaps in housing design guidance and building certification to ensure the quality of new builds, particularly apartments.
- Improving community consultation processes.
- Adequately resourcing built environmental professionals, including planners, in local government.

The project provides an opportunity to significantly increase housing in a well located area, through an increase in density. The HDA Declared SSD enables a concurrent SSDA and rezoning application to help streamline the approval pathway for the project.

2.1.2. NSW Housing Targets

The NSW Government has released 5-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle and 1 target for regional NSW.

The 5-year targets respond to the NSW Government's commitment under the National Housing Accord to deliver 377,000 new well-located homes across the state by 2029. Local, State, and Federal Governments are all signatories to the National Housing Accord and are working together to respond to the national housing crisis.

The 43 local government areas (LGA) received a 5-year target and housing snapshot that explains how many houses are in the pipeline already and how many more are expected to be delivered. Canada Bay LGA has a 5-year target of an additional 5000 dwellings by 2029.

The targets prioritise more diverse and well-located homes in areas with existing infrastructure capacity – such as transport and water servicing – which has been independently reviewed by Infrastructure NSW.

2.1.3. Housing Delivery Authority

The newly established Housing Delivery Authority (HDA) leads a streamlined State Significant Development (SSD) pathway and SSD with a concurrent rezoning process. Developers can submit an EOI to the Housing Delivery Authority for major housing developments above approximately \$60 million in Greater Sydney and \$30 million in regional NSW.

From 8 January 2025, applicants can submit an expression of interest (EOI) to the HDA addressing criteria for major residential developments. Once the HDA recommends a proposal proceed as State Significant Development (SSD), major residential development applications will be eligible to be lodged through one of the following pathways:

- SSD major residential; and
- SSD with a concurrent rezoning.

Before the HDA recommends a proposal be declared SSD, the Department will evaluate it against criteria that meet the objectives of this EOI process, which are:

- Identify high-yield housing proposals by focusing on known high-yield types of residential accommodation;
- Identify housing projects that can be assessed and constructed quickly by focusing on more compliant, major residential proposals that can commence construction quickly;
- Drive quality and affordable housing by focusing on housing development proposals that are well-located, have enabling infrastructure and contribute to affordable housing supply; and
- Complement the State Significant Rezoning Policy by providing a potential pathway for major residential proposals that are seeking concurrent rezoning (spot rezoning).

On 17 February 2025, the Minister for Planning and Public Spaces (**the Minister**), in pursuance of section 4.36(3) of the Environment Planning and Assessment Act 1979, made an Order declaring the development on the site to be State significant development for the purposes of the Environmental Planning and Assessment Act 1979 (**EP&A Act**).

Part 2 of the State Significant Development Declaration Order 2025 included the following Declaration of State Significant Development for the Specified development on specified land declared State significant development:

(f) development specified in EOI application 229650 dated 8 January 2025 including development for the purposes of mixed-use development comprising a commercial premises and residential accommodation with provision for affordable housing at Averill Street and Leeds Street, Rhodes as identified in Schedule 6,

Figure 1 provides a map of the Schedule 6 Land at Averill Street and Leeds Street, Rhodes.

2.1.4. Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are relevant to the proposed development:

- **Objective 5** – Benefits of growth realised by collaboration of governments, community and business.
 - The proposed redevelopment of the site unlocks its full potential to become a landmark waterfront development. Renewal of this site for a mixed-use residential development will provide a meaningful contribution to housing and employment targets for the Precinct, together with funding to support local and regional infrastructure investment.

- **Objective 10** – Greater housing supply.
 - This proposal has the potential to deliver over 200,000 sqm of residential floor space that would directly contribute to the dwelling supply targets for the district.
- **Objective 11** – Housing is more diverse and affordable.
 - The use of 5% of the residential floor space, or an equivalent monetary contribution, for affordable housing is a key driver for this project. The proposal will greatly help in delivering diverse and affordable housing in a strategic and accessible location.
- **Objective 12** – Great places that bring people together.
 - The mixed-use nature of the proposal, together with the provision of a publicly accessible open space at the foreshore, has the potential to bring people together by creating a space that people can share and enjoy.
- **Objective 14** – A Metropolis of Three Cities – integrates land use and transport creates walkable and 30-minute cities.
 - The project provides residential uses in an accessible location that is connected to public transport, employment, and services, contributing to a 30-minute city.
- The site is identified in the Region Plan as located within a 'Planned Precinct' and 'Strategic Centre'. The Region Plan supports residential growth in the area, especially for diverse and affordable housing. This proposal is seeking the orderly development of additional residential and retail floorspace on an underutilised site, which is proximate to an existing train station, bus services and a potential ferry wharf.

2.1.5. Our Greater Sydney 2056: Eastern City District Plan

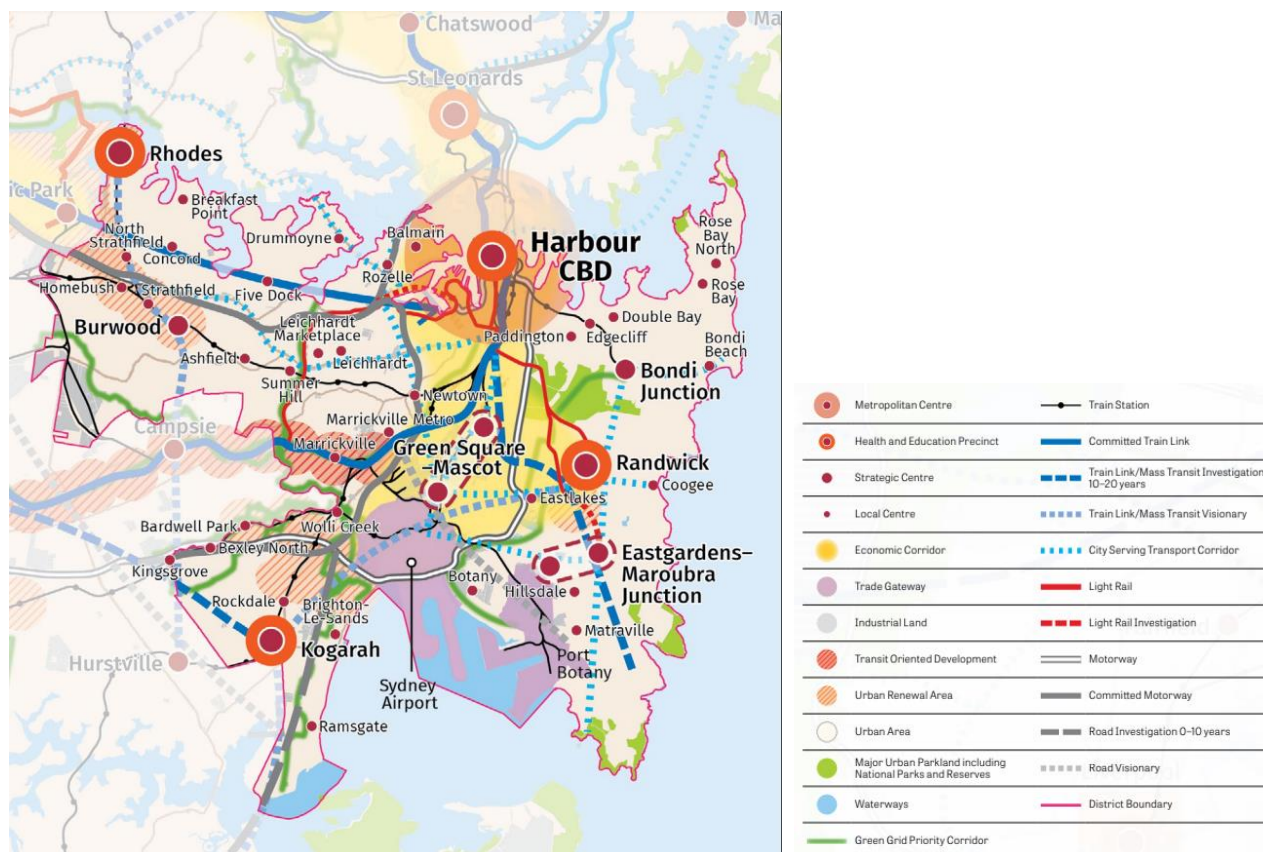
The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The Eastern City District Plan sets out strategic priorities for Rhodes to:

- *Protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre.*
- *Protect employment generating capacity at Rhodes Business Park.*
- *Improve links to the Greater Parramatta Olympic Peninsula area.*
- *Enhance links with the Concord Health Precinct.*
- *Promote place-making initiatives to improve the quality of public spaces.*
- *Develop opportunities to provide sustainable utility infrastructure.*
- *Create a connected walking and cycling network within the precinct, to regional links and where possible along river foreshores.*
- *Plan for growth that is supported by public transport.*

Figure 9 – Structure Plan for the Eastern City District



Source: Eastern City District Plan, March 2018

The proposal will contribute to the objectives set out in the District Plan by promoting growth in residential development and providing additional employment generating opportunities through the mixed-use scheme for the site. The proposal aligns with the following key planning priorities of the District Plan:

- **Planning Priority E4** – Fostering healthy, creative, culturally rich and socially connected communities.
 - The proposal incorporates high-amenity communal open spaces, together with an activated ground plane (including amenity retail), helping to foster a healthy and connected community.
- **Planning Priority E5** – Providing housing supply, choice and affordability, with access to jobs, services and public transport.
 - Rhodes is identified as a strategic centre for housing growth and employment. The development will facilitate the delivery of new dwellings and employment opportunities with access to public transport. The Proposal will assist the City of Canada Bay Council in meeting the District Plan housing and job targets.
- **Planning Priority E10** – Delivering integrated land use and transport planning in a 30-minute city.
 - The proposal supports the goal for a 30-minute city by providing jobs and employment opportunities close to existing public transport.

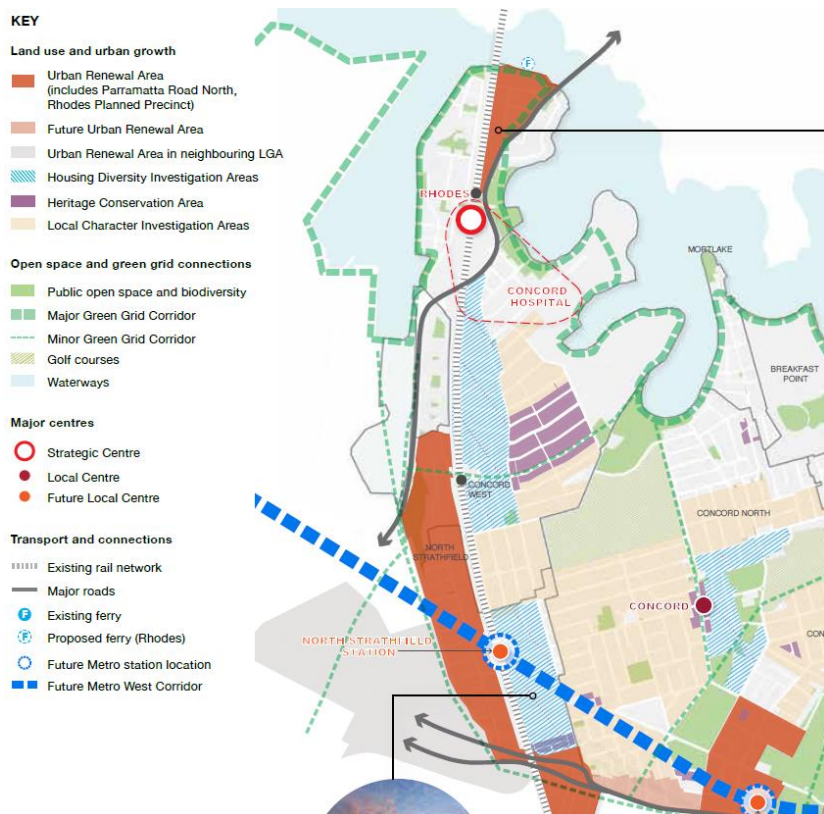
The District Plan identifies the site as being within a 'Strategic Centre'. The site is well placed to deliver housing and services, as identified in the Planning Priorities. The proposal will contribute to much needed housing supply, including diverse and affordable housing, together with employment opportunities and is therefore aligned with the Eastern City District Plan.

2.1.6. City of Canada Bay Local Strategic Planning Statement

The City of Canada Bay Local Strategic Planning Statement (**LSPS**) gives effect to the broader Greater Sydney and Eastern City District Plan down to the local level and provides the strategic framework for the LGA. The LSPS sets out a 20-year plan to 2036 which supports the growth and changes across the LGA.

The LSPS provides several strategic directions and planning priorities which will have implications for the Rhodes precinct. The LSPS Structure Plan is shown in **Figure 5** below.

Figure 10 – Canada Bay Structure Plan



Source: Canada Bay LSPS March 2020

Within the LSPS, Rhodes is identified as a ‘Strategic Centre’ for both housing and employment within the City of Canada Bay. The LSPS also identifies several planning priorities which align with the proposal. These are identified below:

- **Planning Priority 5** – Provide housing supply, choice and affordability in key locations.
 - This proposal responds to the LSPS’ desire to consolidate housing growth around the ‘Strategic Centre’ of Rhodes, which is serviced and zoned for high density housing. The proposal will also make affordable housing contributions to Council, which will help achieve Council’s affordable housing targets.
- **Planning Priority 6** – Provide high quality planning and urban design outcomes for key sites and precincts.
 - The proposal provides a considered response to its context and high-amenity apartment design which meets (or exceeds) the key performance criteria outlined in the NSW Apartment Design Guide (NSW ADG).

2.2. CANADA BAY LOCAL HOUSING STRATEGY 2019

The Canada Bay Local Housing Strategy was released in 2019. It outlines the demographics and growth within the LGA and the plan to deliver the best residential outcomes for the community. The Strategy noted that 92% of dwelling demand between 2018 and 2036 will be for apartments in key centres.

Rhodes is identified in the Strategy as a key area that can deliver the housing needs of Canada Bay. Housing affordability was also a key item within the Strategy where Rhodes East was pinned as a suitable area to deliver this. This project is uniquely positioned to deliver affordable housing and apartments to meet the housing needs of Canada Bay LGA.

2.3. RHODES PLACE STRATEGY 2021

The Rhodes Place Strategy (the '**Place Strategy**') was finalised in September 2021 by the Department of Planning and Environment (DPE) in conjunction with the rezoning of the land.

The Place Strategy sets out the long-term vision for the area and will guide the eastern and central area of Rhodes as it transitions from a lower density residential area to a vibrant residential and commercial centre that supports housing growth and job creation. This includes up to approximately 4,200 new homes, commercial space for an additional 1,100 jobs and 23,000sqm of public open space.

The site forms part of the 'Leeds Street' and 'Cavell Avenue' character area. An extract of the proposed structure plan for the precinct is provided in **Figure 10** below. Within the Place Strategy, Leeds Street is currently characterised as a light industrial area, comprising low-scale industrial buildings (accommodating coffee roasters, construction material manufacturers and warehousing). The existing buildings have a poor relationship with the public domain and the waterfront. Cavell Avenue is currently characterised by low density detached dwellings and community facilities.

The proposal seeks to deliver a vibrant, high amenity, mixed-use development which can deliver on the vision for the Rhodes precinct.

In accordance with the requirements of the *Environmental Planning and Assessment Regulations 2021* ('Regulation'), the EIS will include a statement of consistency against the Rhodes Precinct Place Strategy.

The proposed development is consistent with vision of the *Place Strategy* because it:

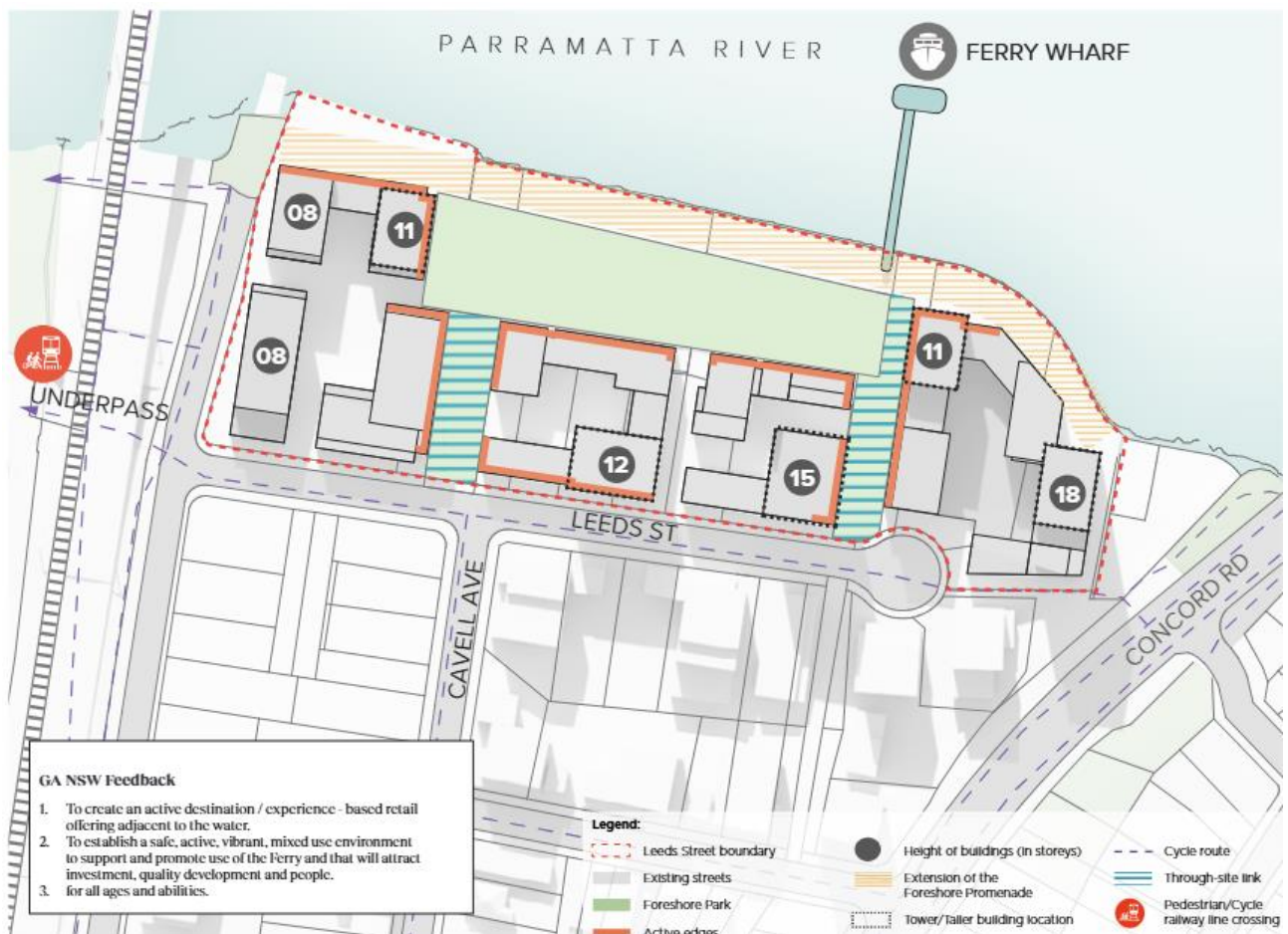
- Delivers a high-amenity mixed-use development, supported by access to public transport, the waterfront and public open space.
- Proposes building heights generally in accordance with the Place Strategy and which respond to environmental constraints such as overshadowing. The arrangement of buildings on site also provides physical and visual links between Leeds Street and the waterfront.
- Makes allowance for the foreshore park and promenade – in line with the Place Strategy structure plan.
- Provides affordable housing.
- Provides active frontages to the public domain, encouraging retail and community activity at ground level.

Figure 11 – Rhodes Precinct Character Areas



Source: Rhodes Place Strategy 2021

Figure 12 – Leeds Street Character Area



Source: Rhodes Place Strategy 2021

2.4. NSW HOUSING STRATEGY: HOUSING 2041

In March 2021, the *NSW Housing Strategy: Housing 2021* was released. It sets out a long-term (20 year) strategy for better housing outcomes across NSW. High density housing and affordable housing was identified as an important housing typology to expand housing choice across the state.

This proposal is well positioned to deliver both housing choice and affordability through the varied apartment types.

3. KEY FEATURES OF SITE AND SURROUNDS

The site is located at Averill Street and Leeds Street, Rhodes, within the City of Canada Bay local government area (LGA) and is situated on the peninsula of East Rhodes.

Leeds Street and Averill Street Rhodes site is a light industrial area on the waterfront bound by Parramatta River to the north, Concord Road to the east, Leeds Street and Averill Street to the south and Cavell Avenue and 23-27 Leeds Street to the west. The site is in a landmark waterfront location along the Parramatta River and is surrounded by public open spaces such as John Whitton Reserve, Mill Park, King George V Park and Uhr's Reserve (**Figure 13**). Rhodes Boat Ramp is also located proximate to the site at the end of Blaxland Road.

The T9 Northern Railway line runs perpendicular to the site. Rhodes train station is 800m (10-minute walk) south of the site via Blaxland Road. The planned ferry wharf is positioned along the northern foreshore boundary of the site. The key features of the site are summarised in Table 8 below.

Table 5 – Key Features of Site and Locality

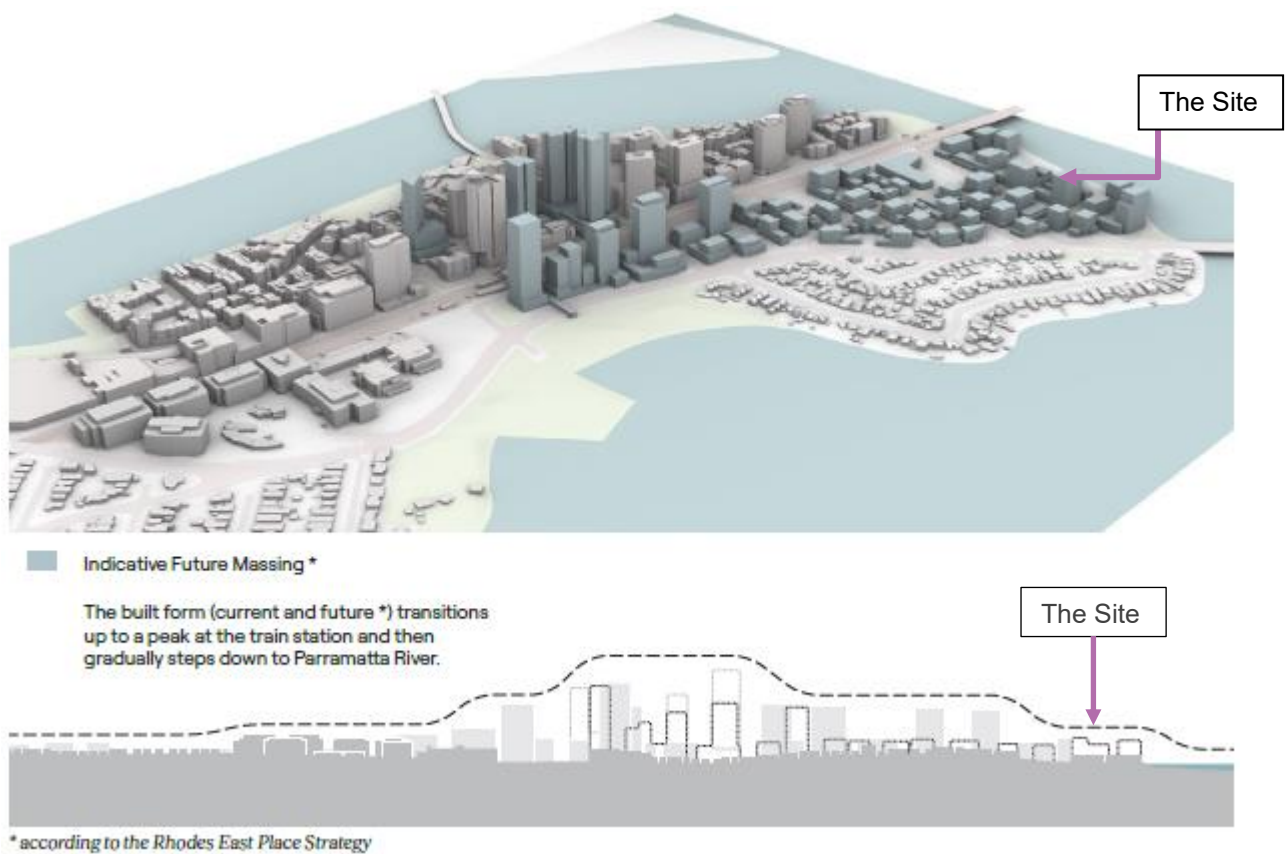
Descriptor	Site Details
Land Configuration	The site comprises 14 lots with a total area of approximately 31,315 sqm. It has the following approximate dimensions: North: 175m of Parramatta River foreshore frontage. North / South: 245m from 1 Averill Street and 11 Averill Street to Parramatta River. East / West : 248m (approx.) from 23 Leeds Street to 2 Leeds Street The site is generally flat and slopes south to north toward the foreshore.
Land Ownership	The land the subject of the Concept SSD and Stage 1 with rezoning application is currently owned or controlled by Leeds Street Developments Pty Ltd.
Existing Development	The site is currently used for light industrial purposes. Low scale industrial buildings extend along the waterfront. The industrial buildings accommodate a variety of activity such as coffee roasters, construction material manufacturers and warehousing. Photographs of the existing developments can be found at Figure 9 below.
Local Context	The surrounding locality is described below: North: To the North of the site is Parramatta River, which separates Rhodes from Meadowbank and the broader Ryde Local Government Area. Rhodes is connected to Ryde via Concord Road and the John Whitton Railway Bridge. East: Uhrs Point Reserve and Concord Road bookend the site in the east. South: Directly to the South of the site and across Averill Street, is a low-density residential area characterised by single detached dwellings and mature tree plantings.

Descriptor	Site Details
	West: Directly adjacent to the west of the site 25 -27 Leeds St development is currently under construction. Further west is Rhodes Boat Ramp at the base of the Parramatta River. The T9 Northern Railway line also runs perpendicular to the site on an elevated bridge across the Parramatta River. John Whitton Reserve is a public park that extends from the boat ramp, under the railway bridge and connects to Mills Park to the west of the railway bridge. Mills Park marks the western end of the East Rhodes Peninsula. Photographs of the surrounding land uses are provided as Figure 10. It is noteworthy that Rhodes is a locality that has been undergoing transition for the past 20 or so years. This started with planning controls introduced in Rhodes West at the turn of the century. More recently, new planning controls were gazetted by NSW DPE for Rhodes East in 2021. This proposal is generally consistent with those controls. Its position within the emerging character of Rhodes has been modelled in Figure 7.
Regional Context	Rhodes has been identified as an important Strategic Centre in the Eastern City District Plan, with significant opportunities to create additional jobs and homes. Rhodes is approximately 12km north-west of Sydney Central Business District (CBD) and approximately 7.5km east of Parramatta CBD. To the south of Rhodes is the Concord Health district which comprises a Public Teaching Hospital and various other health services.
Infrastructure	The site is in proximity to Concord Road which provides a north / south regional connection between the M4 and Victoria Road. Further to this, the site is also within 800m to Rhodes Train Station which runs on the T9 Northern rail line. This line runs from Hornsby through Rhodes to Sydney CBD and north to Gordon.
Site Access	Site access is currently provided from Leeds Street, Cavell Avenue and Averill Street.
Services	The site is currently serviced and will be assessed further in the EIS.
Acid Sulphate Soils	The site contains both Class 2 and Class 5 Acid Sulphate Soils. An Acid Sulphate Management Plan will be prepared to support the SSDA. This is further detailed in Section 7.
Contamination	This is further discussed in Section 7.
Stormwater and Flooding	The site is not mapped as Flood Prone Land or within a Flood Planning Area. However, the site is known to be affected by flooding. Refer to Section 7.
Bushfire Prone Land	The site is not mapped as Bush Fire Prone Land.

Descriptor	Site Details
Natural Environment	Trees and shrubs are present at the site, along the boundary to Leeds Street, Cavell Street and Averill Street and along the foreshore of the Paramatta River. The site is also partially mapped as 'Biodiversity Values' along the foreshore and adjacent Parramatta River waterway.
Aboriginal Heritage	The site is highly disturbed, however there is potential for items of Aboriginal cultural heritage to be located along the foreshore and in the vegetated areas of the site. Therefore, an Aboriginal Cultural Heritage Assessment Report will be submitted with the EIS identifying any cultural heritage values, impacts and mitigation measures to be considered in future development stages.
European Heritage	The site is not mapped as a heritage item, nor is it within a heritage conservation area. However, there are several heritage items in the vicinity of the site. These are listed below: Meadowbank rail bridge over Parramatta River (State Significant) Item 01189. Meadowbank rail bridge over Parramatta River (Local) Item I542. Uhr's Point Reserve (Local) Item I117. Ryde Bridge street trees (Local) Concord Road (Ryde Bridge approach) I116. 14 Cavell Avenue, Rhodes (Local) I77. Cavell Avenue Street Trees (Local) I79.

Descriptor	Site Details
Coastal Zone	The site has several mapping overlays, as below: Foreshore and Waterway Area. The site is mapped within the ‘foreshore and waterway area’ under the Biodiversity and Conservation SEPP. The consent authority must be satisfied that the development will protect the natural assets of Sydney Harbour and ensure the public use of the area is protected. Strategic Foreshore Sites Map (Leeds Street Rhodes). The site is mapped as a ‘Strategic Foreshore Site’ under the Biodiversity and Conservation SEPP. Strategic foreshore sites are to be master planned prior to the granting of development consent. The Leeds Street Precinct has been considered under a masterplan in part of the Rhodes Place Strategy, developed by the DPHI, in partnership with City of Canada Bay Council, State agencies, industry and the community. The vision for the Leeds Street precinct is to deliver a new foreshore area anchored by a mix of uses. The proposal will enhance the vision of the Rhodes Places Strategy and the Rhodes Precinct Structure Plan, satisfying the provisions of the Biodiversity and Conservation SEPP. Foreshore Building Line Map. The northern portion of the site is mapped on the CBLEP 2013 ‘Foreshore Building Line’ Map. The proposal must demonstrate how the foreshore area will be protected / enhanced in accordance clause 6.4 of the CBLEP 2013. An amendment is sought to the foreshore building line map base on proposed building alignments.

Figure 13 – Emerging Character of Rhodes



Source: SJB

Table 6 – Site Context Constraints and Opportunities

Constraints	Opportunities
▪ Views into the proposed school site will need to be managed. ▪ There is a large slope on the site. ▪ Railway corridor acts as a barrier, breaking possible through site links to the west. ▪ Concord Road acts as a barrier, breaking possible through site links to the eastern end of Rhodes Peninsula. ▪ Disconnected public access along foreshore. ▪ Ferry Terminal delivery uncertain. ▪ Primary movement for vehicles blocks pedestrian connections through the precinct. ▪ Heavy pedestrian activity conflicts with railway interface and primary vehicular movement.	▪ Waterfront views and foreshore edge. ▪ Through site link on the site will connect the new foreshore park to John Whitton Reserve. ▪ The proposed school will increase pedestrian density at the site. ▪ New pedestrian links will create a pedestrian loop, improving pedestrian circulation.

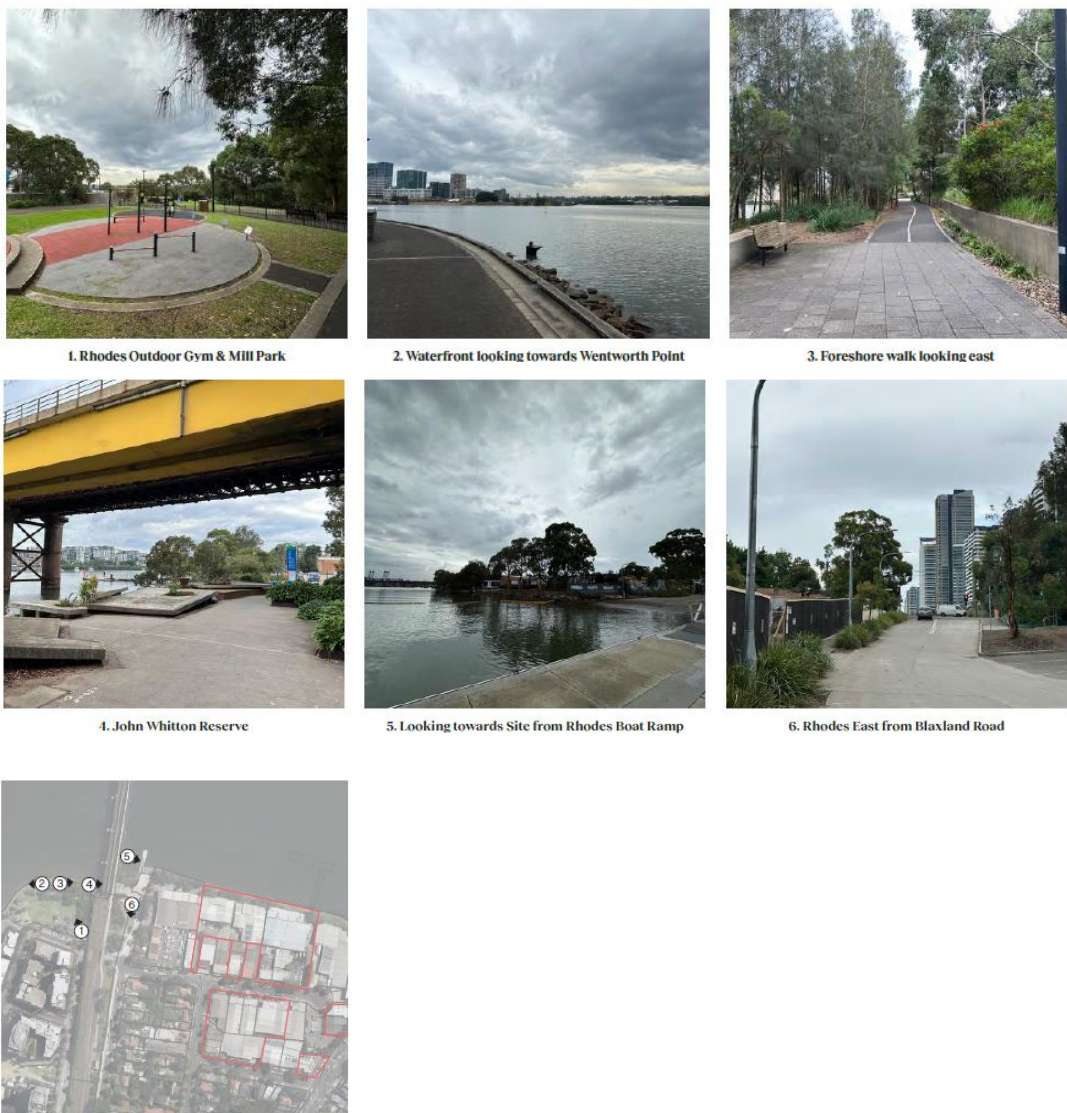
Source: Site and Context Analysis, SJB Urban Design Report

Figure 14 – Site and Context Analysis



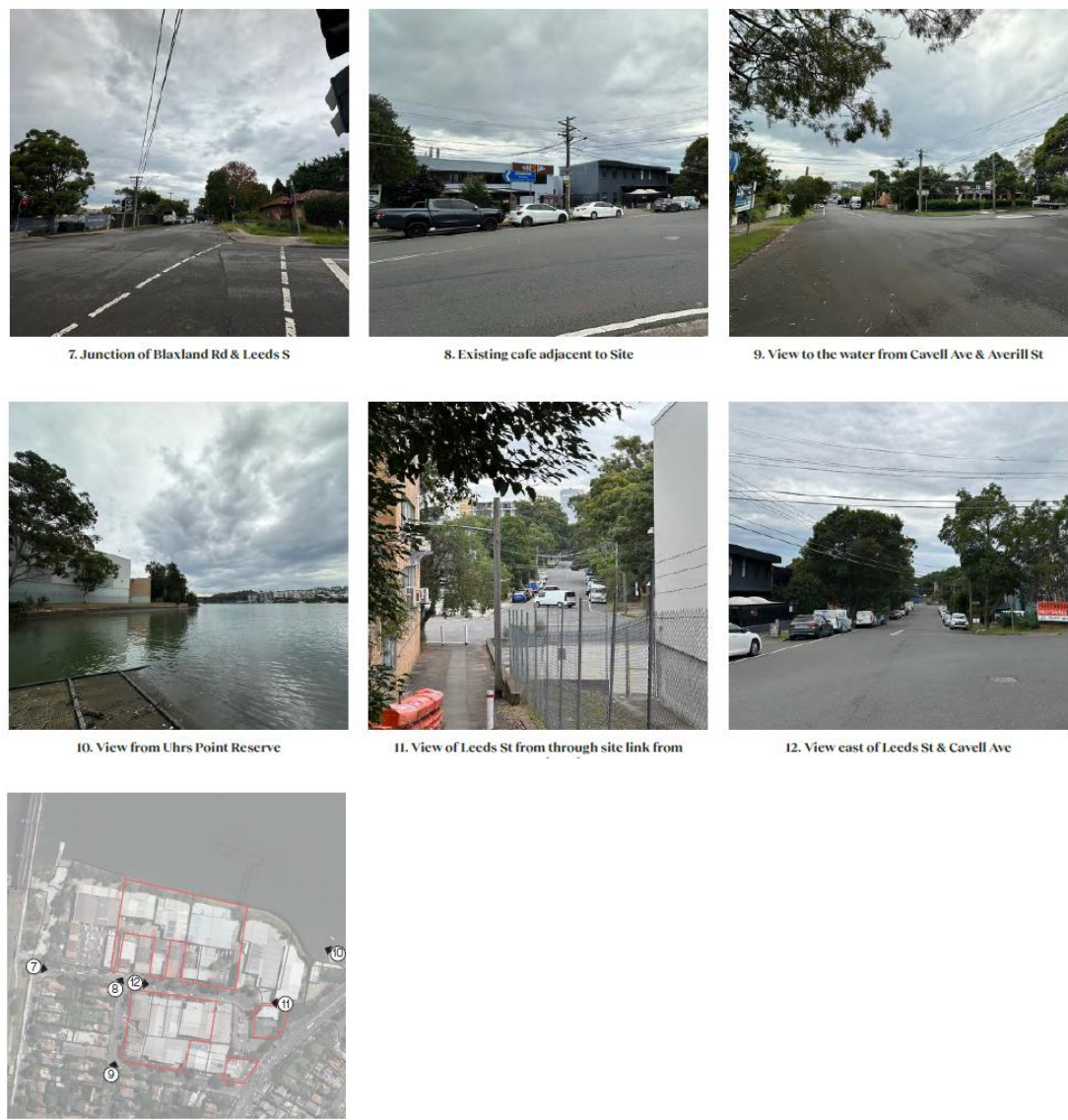
Source: Site and Context Analysis, SJB Urban Design Report

Figure 15 – Site Overview



Source: SJB

Figure 16 – Surrounding Development



Source: SJB

Figure 17 – Local Context Map



Source: SJB

3.1. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

Given the recent introduction of new planning controls, several landowners are progressing with plans to redevelop sites in Rhodes. Desktop research was undertaken using the NSW LEP Tracker, the NSW Major Projects Portal and Sydney Planning Panels websites to identify approved and likely future developments within the locality which may be relevant in the cumulative impact assessment of the proposal.

Table 7 – Relevant Surrounding Approved/Lodged Projects

DA Reference	Development Description	Current Status
DA2023/181 1-9 Maquet Street, Rhodes	Integrated development including demolition of the existing buildings, construction of a 32 storey mixed use development comprising 214 apartments. Application also includes associated basement carparking, landscaping, stratum and residential strata subdivision (Submitted: 30/08/2023)	Determined
DA/2023/0158 33-41 Blaxland Road, Rhodes 444-446 Concord Road, Rhodes 3-5 Llewellyn Road, Rhodes	Development of two buildings of 28 and nine storeys consisting of 285 apartments, medical centre, childcare centre and commercial and retail floorspace. Application also includes 5 levels of basement and 1,500sqm of communal open space	Determined

DA Reference	Development Description	Current Status
SSD-68363729 5-17 and 25-27 Blaxland Road and 440-442 Concord Road, Rhodes	Mixed use proposal for seniors housing, shop top housing, commercial development, and fire station across two towers (south 17 storeys and north 21 storeys) on a shared podium and basement parking.	Preparing EIS
SSD-675087 43B – 57 Blaxland Road, Rhodes 2A, 2B and 2D Cavell Avenue, Rhodes 448-458 Concord Road, Rhodes 2A Lewellyn Street, Rhodes	Demolition of existing buildings and hardstand areas. Construction of four (4) residential flat buildings with infill affordable housing, ranging in height from 12 to 26 storeys with carparking and through site link.	Preparing EIS
SSD-67424709 9 Blaxland Road and 424 Concord Road, Rhodes	Construction of a 48-storey mixed use and in-fill affordable housing development including retail and commercial uses and 313 residential apartments including a 15% affordable housing contribution.	Determined
SSD-67419241 25-27 Leeds Street, Rhodes	Demolition of existing buildings and hardstand areas. Construction of six mixed use residential towers with infill affordable housing, ranging in height from 10 to 18 storeys with carparking. Through site links, foreshore park and promenade.	Response to Submissions
SSD-67636458 23-25 and 29 Marquet Street, Rhodes	Construction of a 42 storey mixed-use development with affordable housing component, basement car parking and publicly accessible open space.	Preparing EIS

The potential cumulative impacts of the project will be addressed in the EIS in accordance with the DPE *Assessing Cumulative Impacts* guidelines.

3.2. AGREEMENTS WITH OTHER PARTIES

Leeds Investments Pty Ltd will seek to enter into a Planning Agreement with DPHI and the City of Canada Bay Council to construct and dedicate the foreshore open space to create the *Leeds Street Foreshore Park*.

These works will assist in the delivery of a new major foreshore public park and promenade along the Parramatta River in accordance with the vision expressed in the Rhodes Place Strategy and to exceed the requirements of Clause 6.4 of the Canada Bay LEP.

The Planning Agreement will seek appropriate offsets against the relevant development contributions plan and the Housing and Productivity Contribution (**HPC**), and set up the parameters for the future dedication of the foreshore open space to Council or another public authority.

It is noted that the delivery of the foreshore park is the responsibility of DPHI (under the Rhodes Place Strategy), with Council ultimately taking ownership to manage ongoing maintenance.

Leeds Investments Pty Ltd has commenced preliminary discussions with Council and DPHI and have obtained preliminary costings for the works, however this is yet to form a formal VPA Letter of Offer. This will be negotiated during the assessment of the SSDA, with the agreement to be in place prior to determination.

3.3. RHODES PRECINCT DWELLING CAP

In finalising the Rhodes Place Strategy in late 2021, DPE gazetted a 'dwelling cap' control into the Canada Bay LEP 2013 (Clause 7.7). The control effectively caps new development in the precinct at 3,000 new dwellings until transport upgrades are completed by local and state agencies. This cap does not include dwellings either existing or approved before 30 October 2021.

SJB Architects have undertaken analysis of dwellings:

- Under construction.
- Under assessment.
- Yet to be realised; and
- Those sites which are undevelopable under the existing planning controls.

The analysis (below and at Appendix E) demonstrates there is latent capacity under the 3,000-dwelling cap (of around 756 dwellings), once all planned developments have been completed, including the five (5) projects being progressed by Billbergia under the in-fill affordable housing provisions of the Housing SEPP.

These projects include:

- 9-13 Blaxland Road.
- Llewellyn Street (comprising 43B – 57 Blaxland Road, Rhodes, 2A, 2B and 2D Cavell Avenue, Rhodes 448-458 Concord Road, Rhodes and 2A Llewellyn Street, Rhodes)
- 25-27 Leeds Street.
- Rhodes Central, Tower C – 23-29 Marquet Street.
- Cavell Avenue

Figure 18 – Rhodes Precinct Number of Dwellings Map

Development map

The map categorises sites within the Rhodes precinct following 4 distinct criteria. This involves:

- Under construction
- Under assessment
- Yet to be realised
- Undevelopable under current zoning

It's important to note that sites under assessment to the south of the precinct have a strict height limit due to the McIlwaine park solar clipping plane.

Dwelling numbers are compared from Pre Place strategy and Post Place strategy to understand the development impact within the precinct.

	Pre Place	Post Place	Dwelling Increase	Affordable Housing
1 Rhodes Central Tower D (34 Walker St)	126	304	178	-
2 Rhodes Central Tower E (34 Walker St)	274	369	95	-
3 Rhodes Central Tower C (Marquet St)	153	270	117	50
4 Delcorp 1-9 Marquet St	165	274	109	42
5 9-13 Blaxland Rd	12	313	301	61
6 Ecove SGW	101	404	303	-
7 Meriton 33-41 Blaxland Rd / 1-5 Llewellyn St	14	285	271	-
8 Billbergia Llewellyn St	23	652	629	110
9 Billbergia Cavell St	8	189	181	27
10 Billbergia Leeds St	12	337	325	51
11 Mirvac/Ikea Leeds St	0	350	350	-
12 Coptic Church	1	77	76	-
13 Denham Street	3	34	31	-
14 Residual Lands	34	37	3	-
TOTAL	926	3,895	2,969	340
Gap from 3,000 target			31	
Gap from 3,000 target - (excluding Pre lodgements)			1,387	
Gap from 4,200 target			1,230	
Gap from 4,200 target - (excluding Pre lodgements)			2,587	



Source: SJB

Table 8 - Rhodes Precinct Numbers of Dwellings

	Pre Place Strategy	Post Place Strategy	Dwelling Increase	No. of AH dwellings	
1	126	304	178		Complete
2	274	369	95		Complete
3	153	270	117	50	Pre-lodgement
4	165	274	109	42	Under construction
5	12	313	301	61	SSDA Approved
6	101	404	303		Under assessment
7	14	285	271		Under construction
8	23	652	629	110	Pre-lodgement
9	8	189	181	27	Pre-lodgement
10	12	337	325	51	Under construction
11	0	350	350		Pre-lodgement
12	1	77	76		Pre-lodgement
13	3	34	31		Under assessment
14	34	37	3		Pre-lodgement
Total	926	3895	2969	340	

Gap From 3000 Target	31
Gap From 3000 Target	1387
Ex. Pre lodgements	
Gap from 4200 target	1231
Gap From 4200 Target	2587
Ex. Pre lodgements	

Further discussion on removing the dwelling cap for the precinct is provided having regard to the transport and traffic capacity of the Rhodes Precinct, in the context of the requirements in the Rhodes Place Strategy is provided in this report.

Figure 19 – Development Map



Source: SJB

4. THE PROJECT

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

4.1. CONCEPT SSDA WITH DETAILED SSDA FOR THE FIRST STAGE AND REZONING APPLICATION

The planning approval pathway is for a concurrent Concept SSDA with Detailed SSDA for the first stage and rezoning application. Figure 20 illustrates the locations of the site subject to the rezoning, Concept SSDA and Detailed SSDA.

Figure 20 - Concurrent Concept SSDA with Detailed SSDA for the first stage and rezoning application



Source: SJB

4.2. PROJECT OVERVIEW

The project involves the construction of nine mixed-use residential buildings. The project will include site preparation works, bulk excavation and infrastructure, construction of the building and ancillary landscaping works.

The key components of the proposed development are listed in the following table. A copy of the Urban Design Report is included at **Appendix A**, and the proposed statutory maps are provided at **Appendix B**.

Table 9 – Project Details

Descriptor	Project Details																																																																																								
Project Description	The Concept Masterplan for the site includes: Nine (9) residential building envelope towers ranging from 22 to 48 storeys, with 1847 new apartments (with the balance to be delivered by adjoining owners within the HDA area). 15,020 sqm of non-residential GFA (retail). 16,325 sqm of public domain. Four (4) levels of basement beneath each stage. Landscaping of public and private domains, including a foreshore park to be dedicated to Canaday Bay City Council, with potential outdoor pool and manmade beach features. Upgrades to the foreshore riverside boundary. Private sporting fields. Improvements to the interfaces of Leeds Street, Cavell Avenue, and Averill Street.																																																																																								
Land Use Zoning	The site is subject to two zonings as defined by the Canada Bay LEP 2013; R4 High Density Residential and MU1 Mixed Use. It is proposed to rezone land in Stage 1 form R4 High Density Residential to MU1 Mixed Use to enable the mix of uses in the proposed master plan. <table><thead><tr><th>Address</th><th>Stage</th><th>Existing LZN</th><th>Proposed LZN</th></tr></thead><tbody><tr><td>No. 2 Leeds St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 2A Leeds St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 4 Leeds St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 6 Leeds St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 1 Averill St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 3 Averill St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 5 Averill St</td><td>4</td><td>R4</td><td>No Change</td></tr><tr><td>No. 7 Leeds St</td><td>3</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 9-11 Leeds St</td><td>3</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 13 Leeds St</td><td>3</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 15 Leeds St</td><td>3</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 17 Leeds St</td><td>2</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 19 Leeds St</td><td>2</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 21 Leeds St</td><td>2</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 23 Leeds St</td><td>2</td><td>MU1</td><td>No Change</td></tr><tr><td>No. 8-10 Leeds St</td><td>1</td><td>R4</td><td>MU1</td></tr><tr><td>No. 12 Leeds St</td><td>1</td><td>R4</td><td>MU1</td></tr><tr><td>No. 14 Leeds St</td><td>1</td><td>R4</td><td>MU1</td></tr><tr><td>No. 16 Leeds St</td><td>1</td><td>R4</td><td>MU1</td></tr><tr><td>No. 7-9 Averill St</td><td>1</td><td>R4</td><td>MU1</td></tr><tr><td>No. 11 Averill St</td><td>1</td><td>R4</td><td>MU1</td></tr></tbody></table>	Address	Stage	Existing LZN	Proposed LZN	No. 2 Leeds St	4	R4	No Change	No. 2A Leeds St	4	R4	No Change	No. 4 Leeds St	4	R4	No Change	No. 6 Leeds St	4	R4	No Change	No. 1 Averill St	4	R4	No Change	No. 3 Averill St	4	R4	No Change	No. 5 Averill St	4	R4	No Change	No. 7 Leeds St	3	MU1	No Change	No. 9-11 Leeds St	3	MU1	No Change	No. 13 Leeds St	3	MU1	No Change	No. 15 Leeds St	3	MU1	No Change	No. 17 Leeds St	2	MU1	No Change	No. 19 Leeds St	2	MU1	No Change	No. 21 Leeds St	2	MU1	No Change	No. 23 Leeds St	2	MU1	No Change	No. 8-10 Leeds St	1	R4	MU1	No. 12 Leeds St	1	R4	MU1	No. 14 Leeds St	1	R4	MU1	No. 16 Leeds St	1	R4	MU1	No. 7-9 Averill St	1	R4	MU1	No. 11 Averill St	1	R4	MU1
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Descriptor	Project Details																																																																																								
Gross Floor Area	Total GFA of 228,107 sqm broken down by land use, as follows: - Residential: 213,087 sqm (including 5% affordable housing). - Non-residential: 15,020 sqm.																																																																																								
Building Height	The site is subject to several different maximum building heights as defined by the CB LEP 2013. The proposed height of buildings are outlined in the table below: <table><tr><th>Address</th><th>Stage</th><th>Existing HOB</th><th>Proposed HOB</th></tr><tr><td>No. 2 Leeds St</td><td>4</td><td>31m</td><td>78m</td></tr><tr><td>No. 2A Leeds St</td><td>4</td><td>31m</td><td>78m</td></tr><tr><td>No. 4 Leeds St</td><td>4</td><td>31m</td><td>No Change</td></tr><tr><td>No. 6 Leeds St</td><td>4</td><td>31m</td><td>No Change</td></tr><tr><td>No. 1 Averill St</td><td>4</td><td>31m</td><td>96m</td></tr><tr><td>No. 3 Averill St</td><td>4</td><td>31m</td><td>No Change</td></tr><tr><td>No. 5 Averill St</td><td>4</td><td>31m</td><td>No Change</td></tr><tr><td>No. 7 Leeds St</td><td>3</td><td>8m RL</td><td>96m</td></tr><tr><td>No. 9-11 Leeds St</td><td>3</td><td>34.1m & 55.8m RL</td><td>150m</td></tr><tr><td>No. 13 Leeds St</td><td>3</td><td>34.1m RL</td><td>150m</td></tr><tr><td>No. 15 Leeds St</td><td>3</td><td>34.1m & 46.5m RL</td><td>No Change</td></tr><tr><td>No. 17 Leeds St</td><td>2</td><td>34.1m & 46.5m RL</td><td>96m</td></tr><tr><td>No. 19 Leeds St</td><td>2</td><td>34.1m RL</td><td>No Change</td></tr><tr><td>No. 21 Leeds St</td><td>2</td><td>34.1m RL</td><td>No Change</td></tr><tr><td>No. 23 Leeds St</td><td>2</td><td>8m RL</td><td>96m</td></tr><tr><td>No. 8-10 Leeds St</td><td>1</td><td>31m</td><td>170m</td></tr><tr><td>No. 12 Leeds St</td><td>1</td><td>31m</td><td>170m</td></tr><tr><td>No. 14 Leeds St</td><td>1</td><td>31m</td><td>135m</td></tr><tr><td>No. 16 Leeds St</td><td>1</td><td>31m</td><td>135m</td></tr><tr><td>No. 7-9 Averill St</td><td>1</td><td>31m</td><td>123m</td></tr><tr><td>No. 11 Averill St</td><td>1</td><td>31m</td><td>123m</td></tr></table>	Address	Stage	Existing HOB	Proposed HOB	No. 2 Leeds St	4	31m	78m	No. 2A Leeds St	4	31m	78m	No. 4 Leeds St	4	31m	No Change	No. 6 Leeds St	4	31m	No Change	No. 1 Averill St	4	31m	96m	No. 3 Averill St	4	31m	No Change	No. 5 Averill St	4	31m	No Change	No. 7 Leeds St	3	8m RL	96m	No. 9-11 Leeds St	3	34.1m & 55.8m RL	150m	No. 13 Leeds St	3	34.1m RL	150m	No. 15 Leeds St	3	34.1m & 46.5m RL	No Change	No. 17 Leeds St	2	34.1m & 46.5m RL	96m	No. 19 Leeds St	2	34.1m RL	No Change	No. 21 Leeds St	2	34.1m RL	No Change	No. 23 Leeds St	2	8m RL	96m	No. 8-10 Leeds St	1	31m	170m	No. 12 Leeds St	1	31m	170m	No. 14 Leeds St	1	31m	135m	No. 16 Leeds St	1	31m	135m	No. 7-9 Averill St	1	31m	123m	No. 11 Averill St	1	31m	123m
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Dwellings	Site	Building	Dwellings																																																																																								
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	4	A	166																																																																																								
		B	129																																																																																								

Descriptor	Project Details		
		C	51
		D	79
	Total		2020
Dwelling Mix	The proposal will deliver 2020 dwellings with a mix of types from studio, 1, 2 to 3+ bedrooms.		
Car Parking	Car parking will be provided via a consolidated basement structures that will sit beneath the buildings. The car parking will be designed to comply with the applicable Canada Bay LEP 2013 rates.		
Expected Capital Investment Value	Greater than \$60,000,000 for residential component. Refer to Appendix C for details.		
Staging	The staged delivery of housing across the site is, as follows: • Stage 1: 834 Dwellings • Stage 2: 188 Dwellings • Stage 3: 573 Dwellings • Stage 4: 425 Dwellings		

4.3. DETAILED DEVELOPMENT DESCRIPTION

The project seeks to deliver a mixed-use precinct. A detailed description of the proposal is provided below.

4.3.1. Summary of the Proposal

In summary, staged development consent is sought for:

- A Concept Proposal for development of the Site in stages as described in the Concept Proposal described below; and
- Section 4.22(4)(b) Works as described in Section 4.3.3.

4.3.2. Concept Proposal

The Concept Proposal seeks consent for:

- Nine mixed use residential tower envelopes ranging from 22 to 48 storeys, comprising 2,020 new apartments and residential Gross Floor Area (GFA).
- 15,020 sqm of non-residential GFA dedicated to retail spaces.
- 16,325 sqm of public domain.
- Four levels of basement parking beneath each stage.
- Comprehensive landscaping of both public and private domains, including a foreshore park to be dedicated to Canada Bay City Council, with potential for an outdoor pool and manmade beach features.
- Upgrades to the foreshore riverside boundary.
- Private sporting fields.

- Enhancements to the interfaces of Leeds Street, Cavell Avenue, and Averill Street.

It is proposed that, in accordance with Section 4.22(4)(a) of the *Environmental Planning and Assessment Act 1979*, consent will be sought separately to erect and use buildings and ancillary development on Stages 2 and 3.

4.3.3. Detailed SSDA Stage 1 Proposal

Under Section 4.22(4)(b) of the *Environmental Planning and Assessment Act 1979*, development consent is sought for the following development ("**Section 4.22(4)(b) Works**"), without the need for a further development consent, as follows:

- Demolition of existing structures and excavation.
- Construction of three mixed-use towers ranging from 33 to 48 storeys.
- Accommodation of 834 apartments.
- Provision of 9,350 sqm of non-residential Gross Floor Area (GFA) for retail.
- Creation of 5,600 sqm of public domain with associated landscaping.
- Approximately 1,438 car parking spaces

Despite the staging described above, it is proposed that Stage 1 must be carried out first and Stages 2 to 4 both inclusive may be carried out in any order and any combination of Stages 2 to 4 inclusive may be combined or carried out simultaneously.

4.3.4. List of Works Forming Part of Detailed SSDA for Stage 1

The works forming part of the Detailed SSDA for Stage 1 are, as follows:

- Site preparation works including:
 - Demolition and site clearing and vegetation removal.
 - Remediation works.
 - Bulk earthworks and grading.
- Works associated with roads and intersections:
 - Averill Street upgrade
 - Leeds Street upgrade
 - Cavell Avenue upgrade
- Drainage and Water Sensitive Urban Design (WSUD) works, including:
 - Stormwater drainage and water quality infrastructure.
- Public domain works, including:
 - Civil works, trenching in road corridors with provision of utility infrastructure for electricity, gas, potable water, sewer and telecommunications.
 - Open space embellishment.
 - Street planting and installation of furniture.
 - Street lighting upgrades to roads.
 - Public art installation.

4.3.5. Proposed Amendments to the CBLEP 2013

As part of the site selection and EOI process for the HDA, a key component of the application is to progress a Planning Proposal concurrently with the SSDA. This is consistent with Section 3.58 of the EP&A Act

Amendment to CBLEP 2013 provisions, including:

- The maximum permitted building height to 78m, 96m, 123m 135m and 150m and 170m. (Clause 4.3 of CB LEP 2013)
- The FSR range to 4.3:1,9.5:1 10:1 and 10.8:1. (Clause 4.4 of CB LEP 2013)
- The Foreshore Building Line (Clause 6.4 of CB LEP 2013)
- Overshadowing of public places in Rhodes Precinct (Clause 7.3 of CB LEP 2013)
- The minimum building separation and maximum floor areas above building podiums in Rhodes Precinct (Clause 7.4 and 7.5 of CB LEP 2013)
- Maximum number of dwellings (Clause 7.7 of CB LEP 2013)
- Minimum site area in Leeds Street Character Area (Clause 7.19 of the CBLEP 2023)

4.3.6. Planning and Urban Design Objectives

The Project has adopted the following objectives:

Unlock public access:

- To enable the delivery of a new ferry wharf, ensuring public access by unlocking private foreshore land through development. The Precinct is well serviced by public transport and promotes connectivity and access to the foreshore hence improving the public domain with the opportunity to reconfigure existing vehicle and pedestrian movement.

Diverse Open Space Network:

- To deliver high quality outdoor sporting facilities and swimming pool in the Rhodes Precinct and an additional 16,325 sqm of publicly accessible open space, which includes passive recreation along the foreshore and a shared open space with the proposed school.

Hybrid Education and Living:

- To engage with the new school at Rhodes East. Co-location of the new open space next to the proposed school could be shared between the community and students, knitting together a hybrid education and living precinct.

Diverse High Quality Dwellings:

- To deliver density in a high amenity built-form typology, including affordable housing, within a highly accessible location close to rail, bus and ferry services.

Active the Public Domain:

- To reconfigure the existing vehicle and pedestrian movement patterns to create additional open space and connectivity to foreshore, with shared zones to enhance pedestrian amenity and activate the public domain.

Direct Foreshore Access:

- To create an activated foreshore destination by planning for continuous and direct public access to Parramatta River Frontage.

4.3.7. Site Layout and Urban Design: Key Moves

The proposed site layout is largely driven by the existing site condition and mitigation of potential impacts on neighbouring sites, including sun access planes.

Figure 21 – Indicative Built Form/Layout Plan (numbers indicate height in storeys)



Source: SJB



Figure 22 – Precinct Section



Source: SJB

Figure 23 – 3D Aerial Perspective



Artist's impression of the proposed scheme.

Source: SJB

4.3.8. Solar Access

The Rhodes Precinct prescribes a series of solar access controls for public open spaces within the Rhodes Peninsula. Of these controls, two impact the development site. This applies to the future foreshore park and planned school opposite the site. The controls prescribe the following:

- **Foreshore Park** - No additional overshadowing to King George Park between 8:30am and 12:30pm mid-winter.
- **School open space** - No additional overshadowing of the future school open space between 10am and 2pm mid-winter.
- **George V Park** - No additional overshadowing to King George V Park between 8:30am and 12:30pm mid-winter

It is noted that the proposal results in some additional overshadowing of King George V Park. The proposed buildings in Stage 4 overshadow 19% of King George V Park at 12.30pm, and 5% of King George V Park at 12.00pm at mid-winter.

The proposal will not result in any additional overshadowing of the Foreshore Park or future school open space during the times prescribed in the Planning controls.

Figure 24 – Solar Access Plane



Source: SJB

4.3.9. Demolition, Excavation and Site Preparation

Demolition of the existing buildings and trees will be undertaken as part of this proposal. Excavation to allow for the basement levels will be in accordance with the demolition plans to be submitted with the EIS.

Site preparation works will include the installation of site services and earthworks. Required excavation and earthworks will be detailed in cut and fill plans which form part of the Civil Plans.

All demolition and excavation works will be undertaken in accordance with a Waste Management Plan.

4.3.10. Car Parking

A consolidated basement carpark (including servicing dock) will be provided over 4 levels for each stage. The residential car parking will be designed to comply with the applicable rates stipulated in the Canada Bay LEP.

4.4. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development. Leeds Investments Pty Ltd identified three project alternatives which were considered in respect to the identified need for the residential development. Each of these options is listed and discussed in the following table.

Table 10 – Analysis of Feasible Alternatives

Option	Comments	
Option 1 – Do Nothing	The existing development is inconsistent with the desired future character identified by the Rhodes Place Strategy and does not maximise its high locational amenity and waterfront location. Given the Rhodes Place Strategy has identified the site for high-density mixed-use precinct, leaving the site as is (Do nothing) would not represent an appropriate long-term use of the site. Therefore, it is evident that a ‘do nothing’ approach is wholly inconsistent with the site’s key features and strategic context and would lead to the site being underutilised.	
Option 2 – Rhodes Place Strategy	The Rhodes Place Strategy establishes a framework and new planning controls under the CBLEP 2013 and DCP. The Urban Design Framework for Leeds Street Precinct and Cavell Avenue precinct results in an inferior outcome for the Rhodes community, which is summarised as follows: - Lack of public open space. At 0.75Ha the Foreshore park is small when compared to other Parramatta River headland parks eg Ballast Pt Park (2.5ha), Balls Head (9ha), Cabarita Park (10ha), Pirrama Park (2.8ha), Putney Park (7.5ha), Wentworth Point (3.5ha). - Disconnection of Leeds Street to the foreshore. The Foreshore Park does not maximise its role as part of a contiguous	

Option	Comments
	open space network, there should be greater visibility and connection to adjacent open spaces. • Inferior perimeter block housing model in terms of internalizing views, overlooking, and south facing dwellings • Limited passive surveillance from the street. The configuration of built form and open space in the Rhodes Place Strategy and current controls will largely conceal the Foreshore Park from adjacent foreshore approaches and compromise amenity through overshadowing. • The Foreshore Park will be enclosed and overlooked by development on three sides, and given the lack of visibility and accessibility, the park will have a privatised feel that subtly discouraged visitors. • Current zoning and FSR controls is economically unfeasible to fund remediation and delivery of foreshore parkland, community facilities, pedestrian links, road upgrades, ferry wharf and other public amenities.
Option 3 – The Proposal	The Housing Deliver Authority declared the project SSD, having decided that it met the HDA SSD criteria. The Proposal delivers additional housing (including affordable housing contributions) in a highly accessible location walkable to trains, buses and a planned ferry stop to be delivered by the State Government. • High density residential development captures waterfront views and creates gateway marker. • Improved public amenity and additional public benefit with public open space, harbour pool, and sports field located adjacent to the planned Rhodes Public School.



Option	Comments	
	• Improved connections and permeability from Leeds Street to water edge and new foreshore promenade. • Active frontages in a thriving mixed use precinct. • Open space improves passive surveillance with more public street frontages.	

The proposal has emerged as the preferred option for the site because it represents the best outcome in respect of urban design, environmental, economic and social considerations. The proposal respects the principles and will deliver an enhanced precinct vision, whilst balancing the various site-specific considerations including solar access and view sharing (as appropriate), delivering an enhanced public open space and community facilities for the Rhodes community and achieving a vibrant ground plane.

Figure 25 – 3D visualisation (Rhodes Place Strategy)



Source: SJB

Figure 26 – 3D visualisation (The Proposal)



Artist's impression of the proposed scheme.

Source: SJB

5. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *NSW Biodiversity Act 2016*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning Assessment Regulation 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy No 65 – Design Quality of Residential Development*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy (Housing) 2021*
- *City of Canada Bay Local Environmental Plan 2013*
- *City of Canada Bay Development Control Plan 2013*

5.1. STATUTORY REQUIREMENTS

The following table categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*.

Table 11 – Identification of Statutory Requirements for the Project

Statutory Relevance	Action
<i>Power to grant approval</i>	On 17 February 2025, the Minister, in pursuance of section 4.36(3) of the EP&A Act, made an Order declaring the development on the site to be SSD for the purposes of the EP&A Act. Part 2 of the State Significant Development Declaration Order 2025 included the following Declaration of State Significant Development for the specified development on specified land declared SSD: <i>(f) development specified in EOI application 229650 dated 8 January 2025 including development for the purposes of mixed-use development comprising a commercial premises and residential accommodation with provision for affordable housing at Averill Street and Leeds Street, Rhodes as identified in Schedule 6</i>
Permissibility	The site is zoned MU1 (Mixed Use) and R4 High Density Residential in accordance with the CB LEP 2013. 'Shop top housing' and 'Residential Flat Buildings' is permitted with development consent within the MU1 (Mixed Use) zone and R4 High Density Residential zone.

5.2. PRE-CONDITIONS

Table 12 below outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the Scoping Report.

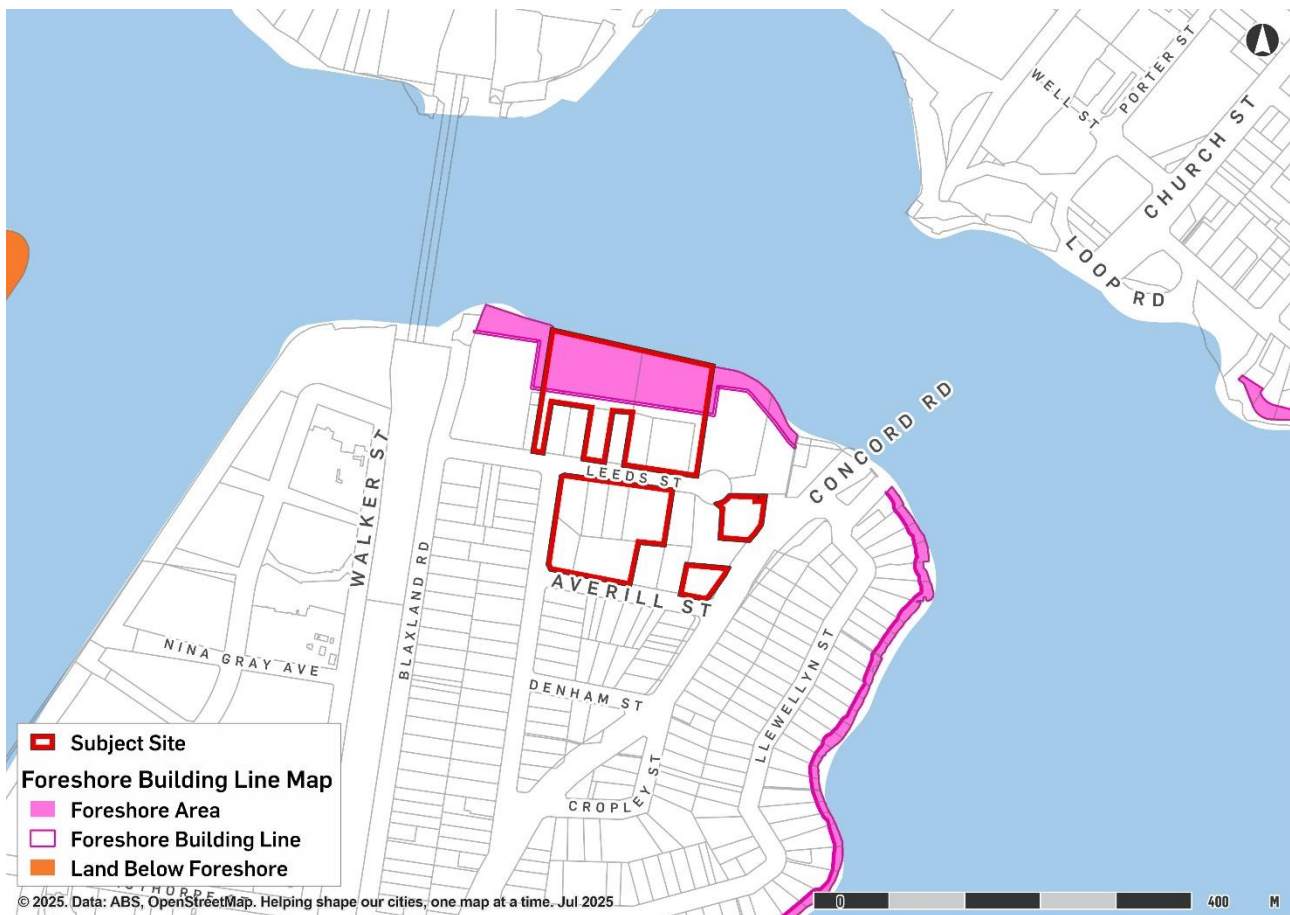
Table 12 – Pre-Conditions

Statutory Reference	Pre-condition	Relevance
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	A consent authority must 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. Section 4.6 of the SEPP provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.	A Detailed Site Investigation is to be prepared. The DSI is to investigate soil and groundwater contamination and recommend any necessary mitigation measures to make the site suitable for the proposed land use including the preparation of a Remediation Action Plan and Hazmat Survey. A DSI will accompany the EIS confirming the suitability of the site from a contamination standpoint (subject to any remediation works).
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	Section 2.122: Traffic-generating development: A public authority, or person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to Transport for NSW (TfNSW) in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.	The proposal is seeking more than 200 parking spaces. The proposed development is therefore considered traffic-generating under the Traffic and Infrastructure SEPP. The application will be required to be referred to TfNSW for a response.

Statutory Reference	Pre-condition	Relevance
<i>Canada Bay LEP 2013</i>	Clause 6.4: Limited development on foreshore area – the objective of clause 6.4 is to ensure that development on land mapped in the foreshore area will not impact on natural foreshore processes or affect the significance and amenity of the area.	As shown in Figure 27 below, the northern portion of the site is mapped as ‘foreshore area’ under Clause 6.4 of the Canada Bay LEP. Clause 6.4 effectively restricts the type of development that can occur in this area to ensure an appropriate provision of open space. An amendment is to be sought to the boundaries of the ‘foreshore area’ as part of the Rezoning Application, with an overall increase in the foreshore area. Leeds Developments Pty Ltd intend to dedicate the foreshore area (once embellished) on completion of the development. The dedication of this land will contribute to the delivery of a new waterfront park and promenade, in line with the vision established under the Rhodes Place Strategy.
	Clause 7.2: Design excellence in the Rhodes Precinct – outlines that any development within the Rhodes Precinct that is greater than 12m or 3 storeys must achieve Design Excellence. In addition to this, the clause also states that any development greater than 28m or 8 storeys must also run a design competition.	Leeds Developments Pty Ltd propose an Alternative Design Excellence Strategy, in accordance with the GANSW Terms of Reference. The Applicant proposes a pathway with a chosen architect having a proven track-record of achieving design excellence with the scheme to be reviewed by an Independent Design Review Panel at key points of design development prior to lodgement.
	Clause 7.7 of the Canada Bay LEP states that development consent must not be granted for development that results in more than 3,000 dwellings in the Rhodes Precinct.	Clause 7.7 requires that development for residential purposes is supported by adequate transport infrastructure in the Rhodes Precinct.

Statutory Reference	Pre-condition	Relevance
		Appendix E confirms the dwelling cap will be breached by this proposal when considered cumulatively amongst other development approvals / projects in the planning phase. Refer to Section 7 for further explanation the dwelling cap.

Figure 27 – Canada Bay LEP 2013 Foreshore Building Line Map



Source: Urbis / CB LEP 2013

5.3. MANDATORY CONSIDERATIONS

Table 13 outlines the relevant pre-conditions to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 13 - Mandatory Considerations

Statutory Reference	Mandatory Consideration
Consideration under the EP&A Act and Regulation	
Section 1.3	Relevant objects of the EP&A Act
Section 4.15	In determining a development application, a consent authority is to take into consideration such matters that are of relevance to the development subject of the development application, as stipulated in section 4.15. These include: • Relevant environmental planning instruments • Relevant draft environmental planning instruments • Relevant planning agreement or draft planning agreement • Development control plans • The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality • The suitability of the site for the development • The public interest
Section 4.38	Section 4.38 contains the provisions for determining a State significant development
Mandatory relevant considerations under EPIs	
Resilience and Hazards SEPP	Section 4.6 – Contamination and remediation to be considered in determining development application Section 2.10 – Development on land within the coastal environment area Section 2.11 – Development on land within the coastal use area
Transport and Infrastructure SEPP	Section 2.98 – Development adjacent to rail corridors Section 2.122 – Traffic-generating development
BASIX SEPP	Section 6 – Buildings to which policy applies
Sustainable Buildings SEPP	Section 2.1 – Standards for BASIX development and BASIX optional development.
Housing SEPP	Chapter 4 - Design of Residential Apartment Development Schedule 9 – Design Principles for Residential Apartment Development
Biodiversity and Conservation SEPP	Chapter 2 – Vegetation in non-rural area Division 3 – Development in Foreshores and Waterways Area Chapter 6 – Water Catchments

Statutory Reference	Mandatory Consideration
Canada Bay LEP 2013	Objectives and land uses for land in Zone MU1 Mixed Use and Zone R4 High Density Residential • Part 4 – Principal development standards • Part 5 – Miscellaneous provisions • Part 6 – Additional Local Provisions • Part 7 – Rhodes Precinct
Affordable Housing	Clause 6.12 of the CBLEP 2013 outlines the affordable housing contribution which applies to the land. The rate that is applied to Rhodes East is 5% of total residential GFA. This is outlined in the <i>City of Canada Bay Affordable Housing Contribution Scheme 2021</i>. This contribution can either be made in kind with the dedication of 5% of the residential GFA as affordable housing or the equivalent monetary contribution.
Considerations under other legislation	
<i>Biodiversity Conservation Act 2016</i> (BC Act) – section 7.14	The BC Act protects native vegetation, species of threatened flora and fauna, endangered populations and endangered ecological communities and their habitats in NSW. Section 7.9 requires a development application for SSD to be accompanied by a Biodiversity Development Assessment Report (BDAR), unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The likely impacts of the proposed development on biodiversity values will be assessed in a BDAR, which will accompany the EIS unless a BDAR waiver is sought and granted for the proposal.
Development Control Plans	
Canada Bay DCP 2013	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the RDCP 2014 for this SSDA. Notwithstanding this, consideration is to be given to the following provisions: • Part B – General Controls. • Part C – Heritage. • Part K – Special Precincts.

Statutory Reference	Mandatory Consideration																												
Rhodes East DCP	The City of Canada Bay prepared a draft Development Control Plan for Rhodes East, following the exhibition of the Rhodes Place Strategy. The controls of the Rhodes East DCP have been incorporated into Part K – Special Projects of the Canada Bay DCP 2013. The DCP aims to clarify the intent of the Place Strategy and provides guidance on design outcomes of built forms, interfaces between public and private realms and provides specific controls relating to the Leeds Street foreshore area. Whilst development controls plans do not apply to SSD as stated in clause 2.10 of the Planning Systems SEPP, consideration of the provisions of the DCP will inform the design of the proposal, to ensure alignment of the proposed buildings and public domain with the vision of the Rhodes Place Strategy.																												
Development Contributions Plan																													
City of Canada Bay Local Infrastructure Contributions Plan (2022)	The City of Canada Bay Local Infrastructure Contributions Plan (CP) authorises the consent authority, when granting consent to an application to carry out development to require either a contribution (under s7.11 of the EP&A Act) or a fixed development levy (under s7.12 of the EP&A Act) to be made towards the provision, extension or augmentation of local infrastructure required as a consequence of development in the City of Canada Bay LGA that has been provided in anticipation of, or to facilitate, such development. The site is located within the Rhodes Peninsula catchment. The following table provides the current monetary contribution rates for Rhodes Peninsula. Section 7.11 Monetary Contribution Rates – Rhodes Peninsula <table><tr><th>CPI Applied – December 2024</th><th colspan="6">Monetary Contribution – Residential Development</th></tr><tr><th></th><th>Per Resident*</th><th>Per Self-contained seniors living or Boarding house room</th><th>Studio/one bedroom dwelling or one bedroom secondary dwelling</th><th>Two bedroom dwelling or two bedroom secondary dwellings</th><th>Three+ bedroom dwellings or three bedroom secondary dwellings</th><th>Additional Lot</th></tr><tr><td>Estimated Occupancy Rate</td><td></td><td>1.4</td><td>1.44</td><td>2.17</td><td>3.12</td><td>3.12</td></tr><tr><td>Development Contribution</td><td>\$10,140.92</td><td>\$14,197.53</td><td>\$14,593.64</td><td>\$20,000</td><td>\$20,000</td><td>\$20,000</td></tr></table> * the per resident rate is relevant to calculating the contributions for group homes and hostels The CP does not apply to the following types of developments: • Development exempted from s7.11 contributions or s7.12 levies by way of a direction made by the Minister for Planning. • Development for the purposes of infrastructure funded by s7.11 contributions or s7.12 levies. • Affordable housing dwellings delivered through the Canada Bay Affordable Housing Contribution Scheme.	CPI Applied – December 2024	Monetary Contribution – Residential Development							Per Resident*	Per Self-contained seniors living or Boarding house room	Studio/one bedroom dwelling or one bedroom secondary dwelling	Two bedroom dwelling or two bedroom secondary dwellings	Three+ bedroom dwellings or three bedroom secondary dwellings	Additional Lot	Estimated Occupancy Rate		1.4	1.44	2.17	3.12	3.12	Development Contribution	\$10,140.92	\$14,197.53	\$14,593.64	\$20,000	\$20,000	\$20,000
CPI Applied – December 2024	Monetary Contribution – Residential Development																												
	Per Resident*	Per Self-contained seniors living or Boarding house room	Studio/one bedroom dwelling or one bedroom secondary dwelling	Two bedroom dwelling or two bedroom secondary dwellings	Three+ bedroom dwellings or three bedroom secondary dwellings	Additional Lot																							
Estimated Occupancy Rate		1.4	1.44	2.17	3.12	3.12																							
Development Contribution	\$10,140.92	\$14,197.53	\$14,593.64	\$20,000	\$20,000	\$20,000																							

Statutory Reference	Mandatory Consideration
HPC (regional) development contributions	Housing and Productivity Contributions (HPC) came into effect on 1 October 2023, which changed how contributions for regional infrastructure are levied. Regional infrastructure includes public amenities or public services, affordable housing, transport infrastructure, regional or State roads and measures to conserve or enhance the natural environment. The contribution rate for residential flat buildings in the Greater Sydney Region is \$10,000 per dwelling or lot. The contribution rate for commercial/ retail land uses is \$30 per square metre of new gross floor area. Affordable housing provided by or on behalf of a social housing provider or is required to be managed by a registered community housing provider as a condition of development consent is exempt from paying the HPC. Additionally, affordable housing that is required by conditions of development consent to be managed by a registered community housing provider is also exempt from the HPC regime. Leeds Investments Pty Ltd is proposing to have the HPC offset against the cost of embellishing the Foreshore Park, a regional/district open space. Further discussions with the DPHI will be required to discuss the Works-in-Kind Agreement or Voluntary planning Agreement for the offset from the HPC.

Connecting with Country (GA NSW 2023)

In July 2023, the NSW Government released the Connecting with Country Framework (CwC), building on the draft framework released in 2020. This is a framework for developing connections with Country that can inform the planning, design, and delivery of built environment projects in NSW. This framework applies to State Significant Development and will need to be implemented in the design of the proposal.

Leeds Investments Pty Ltd are progressing several projects across Rhodes that have been informed by the CwC framework. Engagement with First Nations Knowledge Holders and Traditional Owners is an important aspect of the CwC framework, which will help inform the design strategy and direction for the project, which will commence with the issuing of the SEARs and rezoning requirements.

5.4. CITY OF CANADA BAY COUNCIL LOCAL ENVIRONMENTAL PLAN 2013

The CB LEP 2013 is the relevant LEP pertaining to the site. The concept scheme has been assessed against the relevant provisions of the Canada Bay LEP 20143 as outlined in Table 18. The proposed development complies with the relevant provisions of CLEP 2013.

Table 14 – CLEP Compliance Table

Clause	Control	Comment	Compliance
Clause 4.3 Height of Buildings	Multiple building heights apply to different parts of the site under clause 4.3 of the LEP, as shown below:	The proposed development seeks to increase the maximum permitted heights of building with an	No. Concurrent LEP Amendment.

Clause	Control	Comment	Compliance
		increase in proposed Height provision.	
Clause 4.4 Floor Space Ratio	The maximum FSR for the site prescribed by the LEP is 1.2:1 and 1.7:1. Inclusive of the 5% bonus FSR provided under Clause 7.11 (Cavell Avenue and Leeds Street Precincts), and 5% bonus provided under Clause 7.14 (Cavell Avenue Precinct only) the site has a permissible maximum FSR of 1.26:1 and 1.785:1 (Leeds Street Precinct), and 1.87:1 (Cavell Avenue Precinct).	The proposed development seeks to increase the maximum permitted heights of building with an increase in proposed FSR and open space provision.	No. Concurrent LEP Amendment.
Clause 5.6 Architectural Roof Features	(1) The objectives of this clause are as follows— (a) to allow minor architectural roof features to exceed height limits, (b) to ensure that any architectural roof feature does not cause an adverse visual impact or adversely affect the amenity of neighbouring properties, (c) to ensure that architectural roof features are considered in the design of a building and form an integral part of a building's design. (2) Development that includes an architectural roof feature that exceeds, or causes a building to exceed, the height limits set by clause 4.3 may be carried out, but only with development consent. (3) Development consent must not be granted to any such development unless the consent authority is satisfied that— (a) the architectural roof feature— (i) comprises a decorative element on the uppermost portion of a building, and (ii) is not an advertising structure, and (iii) does not include floor space area and is not reasonably capable of modification to include floor space area, and (iv) will cause minimal overshadowing, and	To be confirmed	To be confirmed.

Clause	Control	Comment	Compliance
	(b) any building identification signage or equipment for servicing the building (such as plant, lift motor rooms, fire stairs and the like) contained in or supported by the roof feature is fully integrated into the design of the roof feature.		
Clause 5.10 Heritage conservation	(2) Development consent is required for any of the following— (a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance)— (i) a heritage item, (ii) an Aboriginal object, (iii) a building, work, relic or tree within a heritage conservation area, (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item, (c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, (d) disturbing or excavating an Aboriginal place of heritage significance, (e) erecting a building on land— (i) on which a heritage item is located or that is within a heritage conservation area, or (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance, (f) subdividing land— (i) on which a heritage item is located or that is within a heritage conservation area, or	The site is not mapped as a heritage item, nor is it within a heritage conservation area. There are several heritage items in the vicinity of the site. These are listed below: • Meadowbank rail bridge over Parramatta River (State Significant) Item 01189. • Meadowbank rail bridge over Parramatta River (Local) Item I542. • Uhr's Point Reserve (Local) Item I117. • Ryde Bridge street trees (Local) Concord Road (Ryde Bridge approach) I116. • 14 Cavell Avenue, Rhodes (Local) I77. • Cavell Avenue Street Trees (Local) I79. A Heritage Impact Assessment will form part of the SSDA.	Yes

Clause	Control	Comment	Compliance
	(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.		
Clause 5.21 Flood Planning	5.21 Flood planning (1) The objectives of this clause are as follows— (a) to minimise the flood risk to life and property associated with the use of land, (b) to allow development on land that is compatible with the flood function and behaviour on the land, taking into account projected changes as a result of climate change, (c) to avoid adverse or cumulative impacts on flood behaviour and the environment, (d) to enable the safe occupation and efficient evacuation of people in the event of a flood. (2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development— (a) is compatible with the flood function and behaviour on the land, and (b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and (c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and (d) incorporates appropriate measures to manage risk to life in the event of a flood, and (e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a	A flood assessment will be undertaken for the EIS/SSDA.	Yes

Clause	Control	Comment	Compliance
	reduction in the stability of river banks or watercourses. (3) In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters— (a) the impact of the development on projected changes to flood behaviour as a result of climate change, (b) the intended design and scale of buildings resulting from the development, (c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood, (d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion. (4) A word or expression used in this clause has the same meaning as it has in the Considering Flooding in Land Use Planning Guideline unless it is otherwise defined in this clause.		
Clause 6.1 Acid sulphate soils	(2) Development consent is required for the carrying out of works described in the Table to this subclause on land shown on the Acid Sulphate Soils Map as being of the class specified for those works. Class of land 2: Works below the natural ground surface. Works by which the water table is likely to be lowered. 5: Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the water table is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land. (3) Development consent must not be granted under this clause for the carrying out of works unless an acid sulphate soils	The site is mapped as comprising Class 2 and Class 5 acid sulphate soil. An ASSMP will be prepared for the EIS/SSDA.	Yes.

Clause	Control	Comment	Compliance
	management plan has been prepared for the proposed works in accordance with the Acid Sulphate Soils Manual and has been provided to the consent authority. (4) Despite subclause (2), development consent is not required under this clause for the carrying out of works if— (a) a preliminary assessment of the proposed works prepared in accordance with the Acid Sulphate Soils Manual indicates that an acid sulphate soils management plan is not required for the works, and (b) the preliminary assessment has been provided to the consent authority and the consent authority has confirmed the assessment by notice in writing to the person proposing to carry out the works.		
Clause 6.2 Earthworks	(1) The objective of this clause is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. (2) Development consent is required for earthworks unless— (a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or (b) the earthworks are ancillary to development that is permitted without consent under this Plan or to development for which development consent has been given. (3) Before granting development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters— (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,	Earthworks will be required as a part of the proposal. A Detailed Site Investigation is to be prepared for the EIS/SSDA. The DSI recommended is to include mitigation measures including and if required a Remediation Action Plan, an Acid Sulphate Soil Management Plan, HAZMAT Survey prepared, together with ecological risk assessments to mitigate any risks of contamination on the site and the surrounding environment.	Yes

Clause	Control	Comment	Compliance
	(b) the effect of the development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.		
Clause 6.4 Limited development on foreshore area	(1) The objective of this clause is to ensure that development in the foreshore area will not impact on natural foreshore processes or affect the significance and amenity of the area. (2) Development consent must not be granted for development on land in the foreshore area except for the following purposes— (a) the extension, alteration or rebuilding of an existing building wholly or partly in the foreshore area, (b) the erection of a building in the foreshore area, if the levels, depth or other exceptional features of the site make it appropriate to do so, (c) boat sheds, sea retaining walls, wharves, slipways, jetties, waterway access stairs, swimming pools, fences, cycleways, walking trails, picnic facilities or other recreation facilities (outdoors).	The part of the site mapped on the foreshore building line map is to be dedicated to Council (in coordination with DPHI) to contribute to the creation of the new publicly accessible foreshore park. An amendment is proposed to the Foreshore Area Map to reflect the concept plans with additional foreshore open space proposed.	Non compliance. An amendment to the Foreshore Building Line Map to reflect the enlarged Foreshore Park is to be included with the Concurrent LEP Amendment.

Clause	Control	Comment	Compliance
	(3) Development consent must not be granted under subclause (2) unless the consent authority is satisfied that— (a) the development will contribute to achieving the objectives for the zone in which the land is located, and (b) the appearance of any proposed structure, from both the waterway and adjacent foreshore areas, will be compatible with the surrounding area, and (c) the development will not cause environmental harm such as— (i) pollution or siltation of the waterway, or (ii) an adverse effect on surrounding uses, marine habitat, wetland areas, fauna and flora habitats, or (iii) an adverse effect on drainage patterns, and (d) the development will not cause congestion or generate conflict between people using open space areas or the waterway, and (e) opportunities to provide continuous public access along the foreshore and to the waterway will not be compromised, and (f) any historic, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance of the land on which the development is to be carried out and of surrounding land will be maintained, and (g) in the case of development for the alteration or rebuilding of an existing building wholly or partly in the foreshore area, the alteration or rebuilding will not have an adverse impact on the amenity or aesthetic appearance of the foreshore, and (h) sea level rise or change of flooding patterns as a result of climate change has been considered. (4) In deciding whether to grant consent for development in the foreshore area, the consent authority must consider whether and		

Clause	Control	Comment	Compliance
	to what extent the development would encourage the following— (a) continuous public access to and along the foreshore through or adjacent to the proposed development, (b) public access to link with existing or proposed open space, (c) public access to be secured by appropriate covenants, agreements or other instruments registered on the title to land, (d) public access to be located above mean high water mark, (e) the reinforcing of the foreshore character and respect for existing environmental conditions. (5) In this clause— foreshore area means the land between the foreshore building line and the mean high-water mark of the nearest natural waterbody shown on the Foreshore Building Line Map. foreshore building line means— (a) the line that is landward of, and at the distance specified on the Foreshore Building Line Map from, the mean high-water mark of the nearest natural waterbody shown on that map, or (b) if no distance is specified, the line shown as the foreshore building line on that map.		
Clause 6.5 Active Street frontages	(3) Development consent must not be granted to the erection of a building, or a change of use of a building, on land to which this clause applies unless the consent authority is satisfied that the building will have an active street frontage after its erection or change of use. (4) Despite subclause (3), an active street frontage is not required for any part of a building that is used for any of the following— (a) entrances and lobbies (including as part of mixed use development),	The site is mapped on the LEP 'active street frontages' map. Specifically, the map requires an active frontage to the future foreshore park. The concept design prepared by SJB indicates ground level retail uses to the foreshore park interface.	An amendment to Active Frontage Map to reflect the proposal will be included with the Concurrent LEP Amendment.

Clause	Control	Comment	Compliance
	(b) access for fire services, (c) vehicular access.		
Clause 6.10 Public utility infrastructure	(1) Development consent must not be granted for development on land in an intensive urban development area unless the Council is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when required.	The site is within an area that has established infrastructure and services. Further information about the anticipated supply of utility services will be provided in the EIS.	Yes
Clause 6.11 Mix of dwelling sizes in residential flat buildings and mixed use development	(3) Development consent must not be granted to development to which this clause applies unless— (a) at least 20% of the dwellings, to the nearest whole number of dwellings, in the development will be studio or 1 bedroom dwellings, and (b) at least 20% of the dwellings, to the nearest whole number of dwellings, in the development will have at least 3 bedrooms.	The dwelling mix will be confirmed at the SSDA stage and form part of the EIS.	To be confirmed.
Clause 6.12 Affordable housing	(6) The affordable housing levy contribution for development in the following affordable housing contribution areas is 5% of the relevant floor area— (a) the Rhodes East affordable housing contribution area, (b) the 1 Ramsay Road Five Dock affordable housing contribution area. (7) A condition imposed under this clause must provide for the affordable housing levy contribution to be satisfied— (a) by dedication in favour of the Council of land comprising— (i) 1 or more dwellings, each having a gross floor area of not less than 50 square metres, with any remainder paid as a monetary contribution to the Council, or (ii) other land approved by the Council in accordance with the Affordable Housing Contributions Scheme, with any remainder	The site is mapped on the Affordable Housing Contribution Scheme Map as an Affordable Housing Contribution Area. The site is located within the Rhodes East affordable housing contribution area. The rate that is applied to Rhodes East is 5% of total residential GFA. This is outlined in the City of Canada Bay Affordable Housing Contribution Scheme 2021. This contribution can either be made in kind with the dedication of 5% of the residential GFA as affordable housing or the	Complies

Clause	Control	Comment	Compliance
	paid as a monetary contribution to the Council, or (b) if the person chooses, by monetary contribution paid to the Council. (8) The rate at which a dedication of land or monetary contribution is taken to be equivalent to the relevant floor area for the purposes of the affordable housing levy contribution is to be calculated in accordance with the Affordable Housing Contributions Scheme. (9) To avoid doubt— (a) it does not matter whether the floor area, to which a condition under this clause relates, was in existence before, or is created after, the commencement of this clause, or whether the floor area concerned replaces an existing area, and (b) the demolition of a building, or a change in the use of land, does not give rise to a claim for a refund of an affordable housing contribution.	equivalent monetary contribution.	
Clause 7.2 Design excellence in Rhodes Precinct	(3) In considering whether the development exhibits design excellence, the consent authority must have regard to the following matters— (a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved, (b) whether the form and external appearance of the development will improve the quality and amenity of the public domain, (c) whether the development detrimentally impacts on view corridors, (d) how the development addresses the following matters— (i) the requirements of a development control plan made by the Council and applying to the land on the commencement of this clause,	Clause 7.2(5) specifies that a competitive design process does not need to be held if the consent authority certifies that in writing. Approval of the competition exemption will be confirmed during planning assessment of Stage 1 Detailed SSDA.	Not applicable.

Clause	Control	Comment	Compliance
	(ii) the suitability of the land for development, (iii) existing and proposed uses and use mix, (iv) heritage issues and streetscape constraints, (v) the relationship of the development with other development, existing or proposed, on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form, (vi) bulk, massing and modulation of buildings, (vii) street frontage heights, (viii) environmental impacts such as sustainable design, overshadowing, wind and reflectivity, (ix) the achievement of the principles of ecologically sustainable development, (x) pedestrian, cycle, vehicular and service access, circulation and requirements, (xi) the impact on, and any proposed improvements to, the public domain, (xii) achieving appropriate interfaces at ground level between the building and the public domain, (xiii) excellence and integration of landscape design.		
Clause 7.3 Overshadowing of public places in Rhodes Precinct	(1) Development consent must not be granted to development that results in a building causing additional overshadowing of a public place identified on the Sun Access Protection Map during the time specified for the public place in the following table— ▪ Leeds Street Open Space – 8:30am-12:30pm ▪ Uhrs Reserve - 8:30am-12:30pm ▪ McIlwaine Park Primary Zone - 8:30am–2pm	The site is in proximity to the Leeds Street Open Space and George V Park which is identified as a public place on the Sun Access Protection Map. Under Clause 7.3 of the LEP there shall be no additional overshadowing to Leeds Street Open Space between the hours of 8:30am and 12:30am and George V	Shadow diagrams will be provided in the EIS.

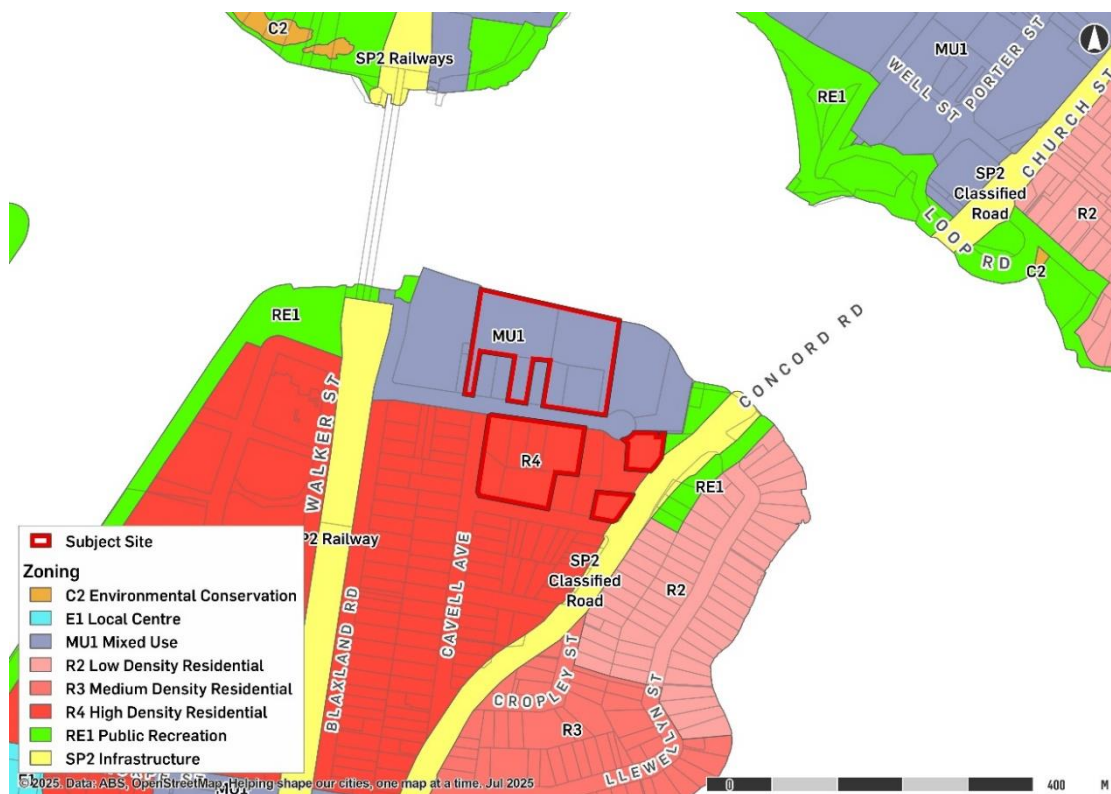
Clause	Control	Comment	Compliance
	- McIlwaine Park Secondary Zone - 8:30am–12:30pm - George V Park – 8:30am-12:30pm	Park – 8:30am-12:30pm. This is detailed in section 6.1.2. An overshadowing analysis has been undertaken for the concept massing which confirms that there will be no additional overshadowing impact to Leeds Street Foreshore Park during the prescribed time.	
Clause 7.4 Minimum non-residential floor space in the Rhodes Precinct	(1) The minimum percentage of the gross floor area of a building on land in the Rhodes Precinct that must be used for non-residential purposes for development consent to be granted to development in relation to the building is specified on the Non-residential Floor Space Map. (2) In this clause— non-residential purposes means purposes other than the following— (a) residential accommodation, excluding seniors housing, (b) serviced apartments, but only if there are, or as a result of the development will be, fewer than 50 serviced apartments on the land, (c) car parks, (d) telecommunications facilities.	The site is not mapped on the non-residential floorspace map of the CLEP. Therefore, this clause does not apply. Nevertheless, 15,020 sqm of non-residential floorspace will be provided for the development.	N/A
Clause 7.5 Minimum building separation and maximum floor areas above building podiums in Rhodes Precinct	(1) Development consent must not be granted to development that results in a building in the Rhodes Precinct being separated from another building by less than— (a) for a building higher than 14 storeys but not higher than 20 storeys—24 metres, or (b) for a building higher than 20 storeys—40 metres.	Towers 1a, b c, 2a, 3a, 4a and b are proposed to be above 20 storeys tall. Proposed building separation distances are, as follows: Building 1A to 3A: 25 metres	No. Amendment to Clause 7.5(b) and Clause 7.5(2) is required as part of the concurrent Amendment

Clause	Control	Comment	Compliance
	(2) Development consent must not be granted to development that results in the gross floor area of a floor of a building in the Rhodes Precinct exceeding 750 square metres. (3) This clause does not apply in relation to the podium of a building in the Rhodes Precinct.	• Building 2A to 2B: 17 metres • Building 2A to 3B: 25 metres • Building 3A to 3A: 24 metres • Building 3B to 3C: 26 metres • Building 3B to 3D: 29 metres	to CBLEP 2013.
Clause 7.6 Maximum height of building podiums in Rhodes Precinct	Development consent must not be granted to development that results in the podium of a building in the Rhodes Precinct being higher than 16 metres.	As demonstrated in the Design Report, the proposed podiums do not exceed 16m.	Yes
Clause 7.7 Maximum number of dwellings in Rhodes Precinct	(1) Development consent must not be granted to development that results in more than 3,000 dwellings in the Rhodes Precinct. (2) The following dwellings are to be disregarded for subclause (1)— (a) dwellings that existed before 30 October 2021, (b) dwellings permitted by a development consent granted before 30 October 2021.	Clause 7.7 requires that development for residential purposes is supported by adequate transport infrastructure in the Rhodes Precinct. Refer to Section 2.8 of the Scoping Report for further explanation of how this 'cap' is proposed to be assessed and managed.	No
Clause 7.8 Maximum number of car parking spaces for uses of land in Rhodes Precinct	(2) The maximum number of car parking spaces is as follows— (a) for commercial premises other than retail premises—1 space per 150 square metres of gross floor area used for that purpose, (b) for retail premises other than restaurants or cafes—1 space per 100 square metres of gross floor area used for that purpose,	Car parking for the development will comply with the maximum LEP car parking controls.	Yes

Clause	Control	Comment	Compliance
	(c) for restaurants or cafes—1 space per 150 square metres of gross floor area used for that purpose, (d) for dual occupancies, multi dwelling housing, residential flat buildings and shop top housing— (i) 0.6 spaces per studio dwelling, and (ii) 0.6 spaces per dwelling with 1 bedroom, and (iii) 0.9 spaces per dwelling with 2 bedrooms, and (iv) 1.4 spaces per dwelling with 3 or more bedrooms, and (v) 1 visitor car parking space per 7 dwellings. (3) If the total number of car parking spaces under this clause is not a whole number, the total is to be rounded down to the next whole number.		
Clause 7.10 Site area of proposed development in Rhodes Precinct includes dedicated land	The site area of proposed development on land in the Rhodes Precinct is, for the purpose of applying a floor space ratio under clause 4.5, taken to include land that— (a) is dedicated to the Council for a public purpose or otherwise set aside as publicly accessible open space or as a pedestrian link, and (b) would have been part of the site area if it had not been dedicated or set aside.	The site area includes land that is to be dedicated to Council. This has been included in the site area / FSR calculation, in accordance with this control.	Yes
Clause 7.11 Additional floor space for certain BASIX affected buildings in Rhodes Precinct	(1) A BASIX affected building on land in the Cavell Avenue Character Area, Leeds Street Character Area or Station Gateway East Character Area may exceed the maximum floor space ratio shown for the land on the Floor Space Ratio Map by 5% if the building— (a) exceeds the BASIX commitment for energy for the building by at least 15 points, and	The proposal will not be relying on the BASIX FSR bonus.	N/A

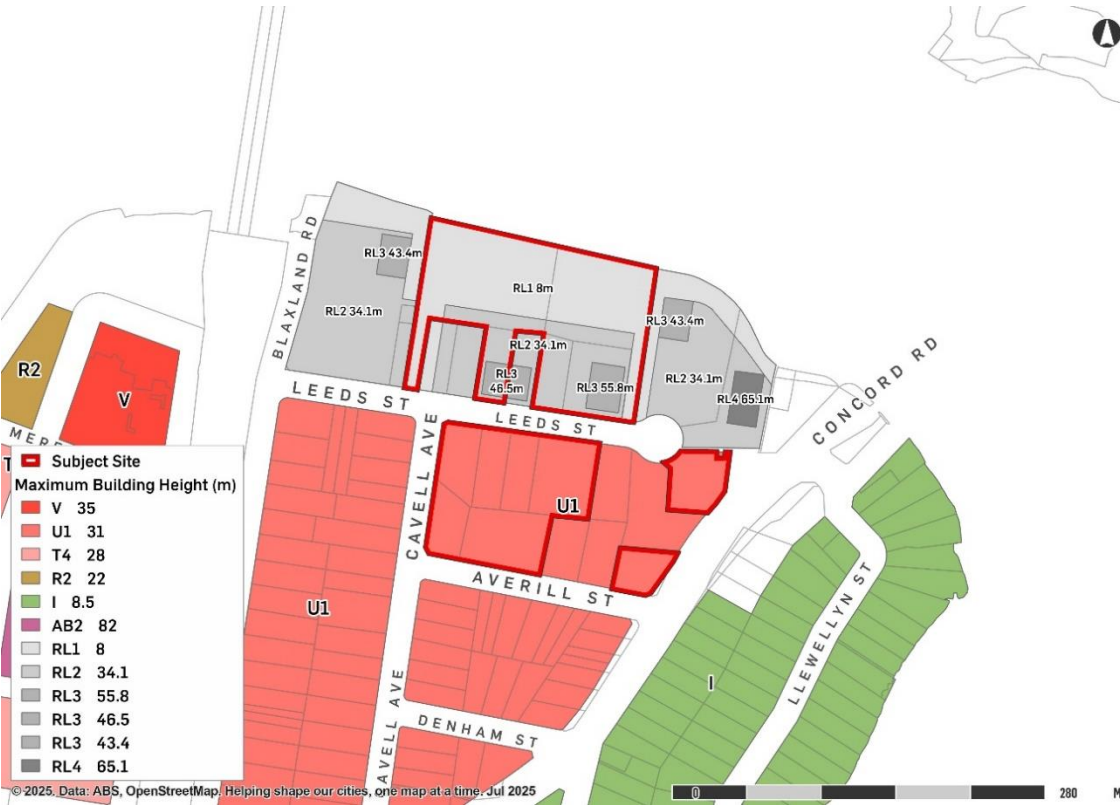
Clause	Control	Comment	Compliance
	(b) exceeds the BASIX commitment for water for the building by at least 20 points.		
Clause 7.19 Minimum site area in Leeds Street Character Area	The minimum site areas for development in accordance with Clause 7.19 are: Site B – 12,000 sqm Site C – 9,000 sqm Site D – 10,000 sqm	The portion of the site within the Leeds Street Character Area is mapped as on the Additional Local Provisions Map as subject to minimum site area clause of the LEP applies. The proposal is consistent with the intent for the minimum lot size controls to facilitate development of the foreshore land including the Leeds Street Foreshore Park.	No. An amendment is sought to remove Clause 7.19 of the CBLEP 2013, as the proposal achieves a superior outcome in terms of the delivery of additional foreshore open space

Figure 28 – Zoning Map



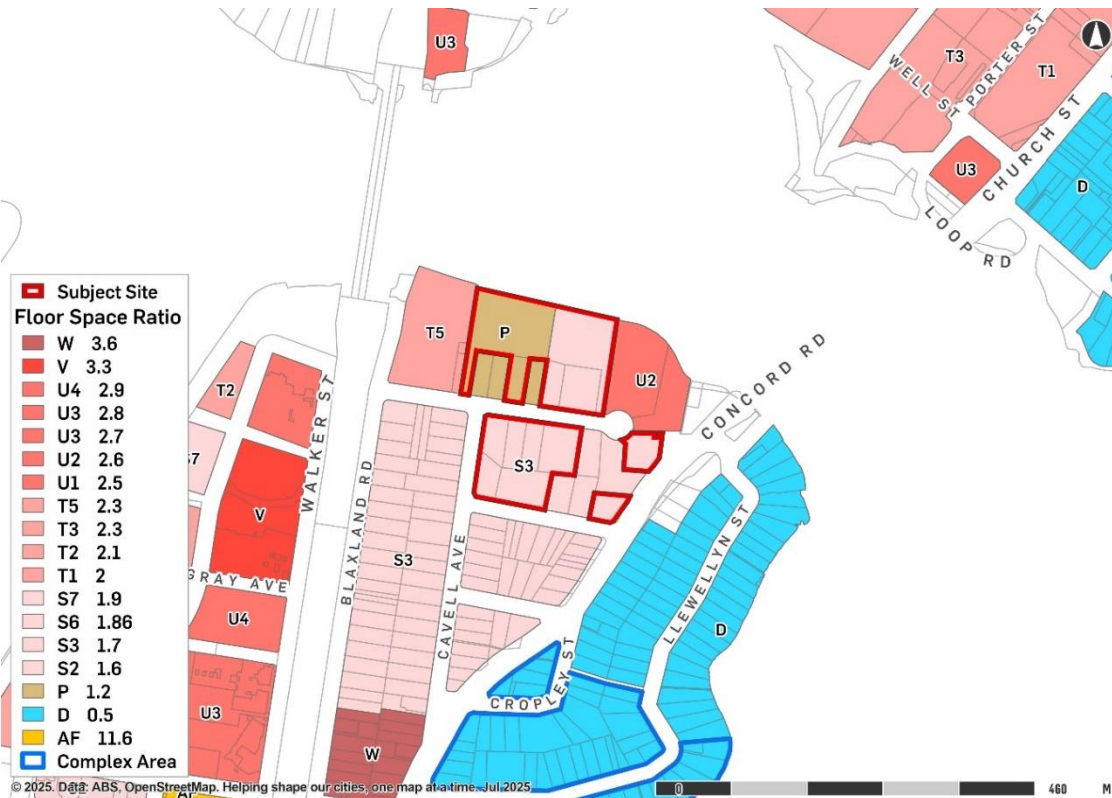
Source: Urbis

Figure 29 – Height of Building Map



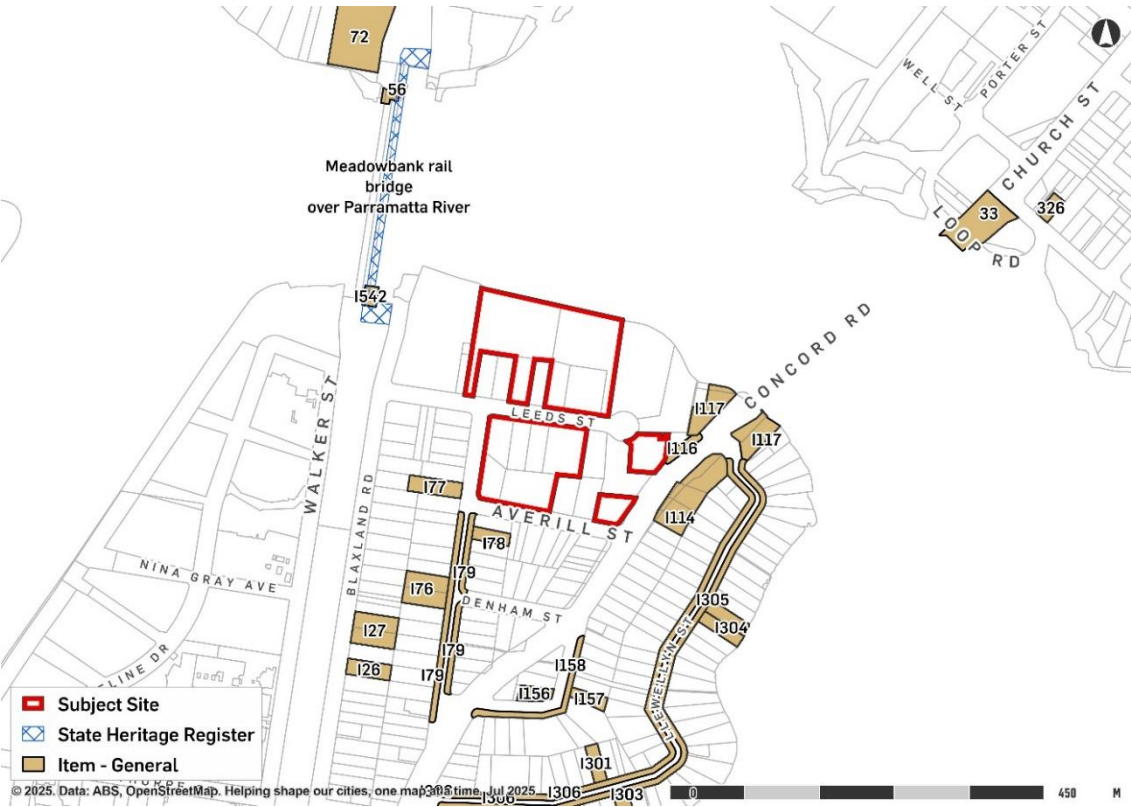
Source: Urbis

Figure 30 – FSR Map



Source: Urbis

Figure 31 – Heritage Map



Source: Urbis

Figure 32 – Foreshore Building Line Map



Source: Urbis

6. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have already been carried out for the project, including preliminary community views, and the engagement to be carried out during the preparation of the EIS.

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

6.1. ENGAGEMENT CARRIED OUT

Initial discussions about the site and the project, as a whole, have occurred with the City of Canada Bay Council, the DPHI and GANSW.

For this specific project, it is expected that the Applicant will conduct a **planning focus meeting** with key Departmental staff before the issuance of SEARs. Once the SEARs are received, the Applicant will proceed with the formal consultation process as part of preparing the Environmental Impact Statement (EIS) and concurrent rezoning application, as detailed in Section 6.2 below.

6.2. ENGAGEMENT TO BE CARRIED OUT BY THE APPLICANT

Further community and stakeholder consultation will be undertaken in the preparation and assessment of the EIS including:

- **Key Stakeholders:** it is proposed to consult with the following stakeholders during the preparation of the EIS:
 - City of Canada Bay Council.
 - Agencies, including TfNSW.
 - Department of Planning and Environment, including GANSW.
 - Surrounding residents, businesses and local community groups.
- **Other Interested Stakeholders:** additional stakeholders may be identified during the preparation of the EIS.
- **Key Actions:** the following actions will be undertaken to keep the community informed regarding the project, obtain feedback from the community on the project and engaged with stakeholders on the detailed assessment of key matters:
 - A dedicated engagement strategy will be prepared following the issue of SEARs.
 - Additional consultation actions may be identified following further engagement with key stakeholders and DPE.
 - The EIS and supporting documentation will be placed on public exhibition, providing stakeholders with an additional opportunity to review the Project, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

The proposed actions are consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects*. An engagement consultant will be responsible for monitoring, reviewing and adapting the effectiveness of the engagement strategy to encourage community participation in the Project.

7. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

7.1. MATTERS REQUIRING FURTHER ASSESSMENT IN THE EIS

The following section of the report provide a comprehensive description of the relevant matters and impacts which will be addressed in detail within the EIS. It outlines the matters and impacts of particular concern to the community and other stakeholders. It includes each of Key Issues and Other Issues as identified in the Scoping Summary Table (refer **Appendix B**).

7.1.1. Compliance with Strategic and Statutory Plans

The proposed development is consistent with the surrounding land uses and character of the broader precinct. The EIS will include a detailed assessment of the proposed development against the relevant strategic and statutory provisions previously identified.

7.1.2. Transport, Traffic and Access

Transport and traffic capacity

The Rhodes Place Strategy provides for an additional 4200 dwellings with an initial dwelling threshold of 3,000 dwellings until further infrastructure is provided and the right transport capacity is in place. The maximum of 3000 dwellings in the Rhodes Precinct currently applies to the site under Clause 7.3 of the CBLEP 2013.

It is proposed to exclude the Leeds Street and Averill Street, Rhodes site from the maximum number of dwellings, via site-specific exclusion in the CBLEP 2013.

The intended outcome is to realise the vision for Rhodes Precinct, the Rhodes Place Strategy and the planning and design outcomes sought for the Leeds Street and Averill Street Rhodes site.

The Rhodes Place Strategy actions for the NSW Government to consider if adequate transport infrastructure is committed or constructed, or whether a Transport and Traffic Assessment, prepared in consultation with Council and Transport for NSW demonstrates there is sufficient capacity to accommodate the total of 4,200 dwellings in the precinct. To realise additional dwellings beyond the 3000 dwelling threshold an amendment to the Canada Bay LEP will be required to facilitate the full vision for the precinct as set out in the Rhodes Place Strategy for 4200 dwellings.

Leeds Investments Pty Ltd commissioned PwC to undertake an assessment of trip generation and capacity in Rhodes. The observed vehicle trip generation rates from July-August 2022 were found to be up to 0.11 (AM) and 0.08 (PM) lower than the Rhodes Precinct Studies assumptions adopted by TfNSW and the DPHI in 2017 and 2021. This assessment signifies a change in travel behaviour compared to the assumptions adopted in establishing the capacity of the road network including Concord Road for the Rhodes Place Strategy, and provide evidence there is additional capacity in the road network to support additional dwellings.

Leeds Investments Pty Ltd also commissioned Hanover in 2023 to undertake an updated strategic transport analysis that considers travel demand on the T9 Northern Rail Line. In summary, the key findings of the analysis are, as follows:

- Most recent land use forecasts for the Rhodes Precinct are lower than what was assumed in the 2018 rail assessment report, prepared for the Rhodes Place Strategy.
- Opal data shows that patronage at Rhodes Station is lower than expected and has decreased by approximately 27% since 2018 in the post-COVID era.
- 2023 observed train loadings are lower by nearly 20% compared to previous predictions.

- Sydney Metro City and Southwest, Sydney Metro West, and Parramatta Light Rail Stage 2 are predicted to lower train loadings into Strathfield and thereby maintaining acceptable levels of train crowding on the T9 services, as future development continues to grow and intensify (including affordable housing).
- A quadruplication of the T9 Northern Line (between Epping and Strathfield) to service higher population and employment projections in Rhodes is unlikely to be required.

In addition, to the rail capacity demonstrated at Rhodes Station, extra 7 services each weekday was added to the Parramatta River route between Circular Quay and Sydney Olympic Park on 1 July 2024. A new ferry wharf at Rhodes that is a part of the infrastructure required for the Rhodes community under the Rhodes Place Strategy will provide residents with additional public transport services to destinations between Parramatta and Sydney.

The strategic transport analysis based on updated data provides evidence there is capacity in the transport network for additional dwellings beyond the 3000 dwelling cap.

Analysis of the number of dwellings in the Rhodes Precinct that are either under construction, under assessment, and yet to be realised provides an understanding the development activity. In summary, development activity accounts for 2,969 dwellings, which is only 31 dwellings below the 3,000 dwelling threshold, and 1,231 dwellings below the overall 4200. The proposal is for 2020 dwellings.

In addition to traffic relate impacts, the impacts on the public transport network for increased patronage will need to be further assessed as part of the SSDA. The FSR and Height controls applying to the site were partly decided from a detailed transport assessment to determine the capacity of the existing transport network.

Pentelic Advisory has prepared a High-Level Transport Capacity Review in support of the proposal. The advice assessed the future capacity of the transport network for the Rhodes Precinct and the T9 Northern Line. It draws on analysis from several deliverables previously presented to TfNSW and DPE, including:

- Rhodes Station Rail Demand Report – Dr Neil Prosser (September 2018).
- Wentworth Point Block H Transport Study – PwC (February 2022).
- Rhodes Precinct Rhodes West Trip Generation and Capacity Assessment – PwC (December 2022).
- Hannover Review of Rail Capacity Assessment of T9 Northern Line – Hannover (October 2023).

The advice provides evidence to support the additional dwellings within the Rhodes Precinct beyond the current cap of 3,000 dwellings. Key conclusions of the letter are as follows:

- Trip generation surveys were undertaken in November 2022 which reflect the most recent (post-COVID) travel patterns for the Rhodes Precinct. In both the AM and PM peak hours – the trip per apartment rate was 32% and 36% lower (respectively) than the rate adopted by DPE in implementing the planning controls for the Rhodes Place Strategy (including 3,000 dwelling cap).
- The latest trip generation rates (0.15 trips per apartment in the AM peak and 0.14 trips per apartment in the PM peak) align with the intent to achieve non-car mode shares significantly better than the 0.22 vehicle trips per apartment rate adopted in the DPE study.
- Research undertaken by PwC indicates there is capacity for approximately 2,000 dwellings on top of the existing cap of 4,200 dwellings for both the Rhodes East (3,000 dwellings) and Rhodes West (1,200 dwellings). This is based on the reduced trip generation rate and strong evidence of sustainable travel behaviours in Rhodes to support additional residential development, including affordable housing.
- The various Sydney Metro projects underway will reduce pressure on the T9 Northern Line. Current NSW Government projects such as the Parramatta Light Rail (Stage 2) will further encourage sustainable transport usage and reduce passenger demand on the T9 Northern Line.
- The most recent Opal data shows a clear reduction in rail patronage at Rhodes Station post COVID due to residents WFH, relieving passenger demand on the T9 Northern line. While some COVID behaviours may rebound over time, the WFH trend is unlikely to return to pre-COVID levels.

- Rail capacity analysis undertaken by Hannover Consulting (considering the NSW Government transport projects currently afoot) shows acceptable levels of train crowding in the year 2036, thereby not triggering the need for quadruplication of the T9 Northern Line (between Epping and Strathfield).

The high-level review was prepared to support the issuance of project specific SEARs. A detailed assessment of cumulative impacts will be undertaken and provided in the EIS and rezoning application.

The EIS/SSD and rezoning application will be supported by a Traffic and Transport Impact Assessment prepared by a qualified transport consultant. The report will analyse parking requirements, existing and expected traffic impacts on the local road network and the design of proposed vehicular entry points. The Transport Impact Assessment will further identify management and mitigation measures which may need to be considered as part of the development. A Green Travel Plan will also accompany the EIS.

A Construction Traffic Management Plan will be developed to assess impacts during the construction phase of the Project.

Traffic

It is anticipated that during construction and operation there will be an increase in traffic movements. The construction traffic movements will be temporary. During operation, the proposed development will likely increase traffic movements. Consideration of peak traffic movements will need to be considered and the impact this will have on the surrounding road networks.

An assessment will be required to confirm that an additional residential and non-residential GFA will have an acceptable impact on traffic and surrounding roads.

Parking

Clause 7.8 of the CB LEP outlines the maximum number of car parking spaces for land within the Rhodes Precinct. These are outlined below:

- *0.6 spaces per studio or 1 bedroom dwelling*
- *0.9 spaces per 2 bedroom dwelling*
- *1.4 spaces per 3 or more bedroom dwelling*
- *1 visitor car parking space per 7 dwellings*
- *1 space per 150sqm of commercial GFA*
- *1 space per 100sqm of retail GFA (other than cafes and restaurants)*
- *1 space per 150sqm of café or restaurant GFA*

A detailed assessment on the transport needs of the proposed development will be included in the Transport Impact Assessment, which will be prepared as part of the EIS.

Access

The site is currently accessed via Leeds Street, Cavell Avenue and Averill Street. Concord Road is the major thoroughfare through Rhodes running north south. It provides a link from Macquarie Park and the M2 to Strathfield and the M4. The rezoning application and EIS for the SSDA will be supported by a Traffic and Transport Impact Assessment prepared by a qualified traffic consultant.

7.1.3. Built Form, Urban Design and Public Domain

Concept Architectural Plans are provided in the Design Report, prepared by SJB Architects at **Appendix A**. These plans provide a preliminary indication of the proposed building footprints and envelopes and open spaces that form this SSDA with concurrent rezoning. The proposal is an enhanced built form outcome for the site and will comprise building heights ranging from 22 to 44 storeys and a total GFA of 212,123 sqm).

The overall design will consider architectural appearance, including façade articulation strategies and landscape treatments, to deliver a high-quality built form outcome. The final architectural package will also

detail the rationale for the siting and layout of the proposed development, including loading and access arrangements.

The CB LEP requires 'active' frontages along the northern and eastern frontage of the site. The intention is to create active interfaces with the planned Foreshore Park and Promenade. Consideration will also be given to improving pedestrian connectivity through the site, creating physical and visual connections from Leeds Street to the waterfront.

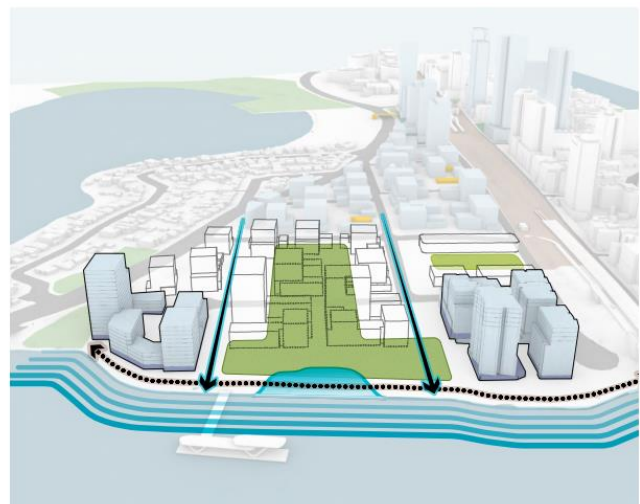
Key Urban Design moves established for the Project illustrated in Figure 33, include:

1. Enhance Open Space for Leeds Street and Cavell Avenue Precincts
2. Connecting Cavell Avenue Precinct and revitalise the foreshore
3. Create a diverse variety of amenity
4. Create a connection through the site to surrounding context and activating public domain
5. Shifting vehicle access to create pedestrian-friendly, car light streets
6. Creating a skyline along the foreshore reflective of surroundings

Figure 33 - Key Design Moves



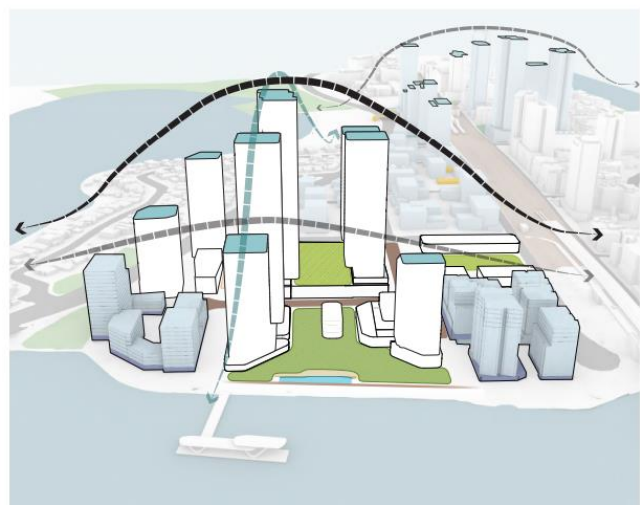
1. Enhance open space for Leeds St and Cavell Ave



2. Connecting Averill St and Cavell Ave to the water, revitalising the foreshore



3. Creating connections through the site to surrounding context and activating public domain



4. Creating a skyline along the foreshore reflective of surroundings

Source: SJB

Given the location of the site on the Parramatta foreshore, consideration will be given to the visual impact of the proposed development when viewed from the surrounding area. A visual impact consultant will be

engaged to provide strategic advice regarding the key sightlines to the site, including recommended mitigation measures to off-set, minimise or manage potential visual impacts.

The Apartment Design Guidelines (ADG) will also be a consideration as design development continues. The scheme is capable of meeting key ADG amenity criteria relating to building separation (on merits), solar access, cross ventilation, and overshadowing. A complete assessment against the ADG will occur at EIS stage.

The Canada Bay DCP and the Draft East Rhodes DCP provide a range of built form controls for development within the Rhodes East Precinct. This includes key development parameters, design principles, setbacks, landscape treatment and urban elements etc. It will be important that the design of the proposal demonstrates compatibility with the scale, siting and desired future character of the area.

The EIS/SSD and rezoning application will outline the proposed development in detail, including analysis of the height, bulk and scale with respect to the surrounding local context. This will include a comprehensive response in relation to:

- The interface with surrounding development, adjacent school and the public domain.
- Consideration of the building layout, massing and setbacks.
- Visual impact when viewed from the public domain and key vantage points around the site.

The EIS/SSD and rezoning application will be accompanied by a detailed set of Architectural Plans and Design Report. The EIS/SSD will also be accompanied by a BCA Compliance Report and Accessibility Report to ensure the proposed design is capable of achieving compliance with the *Building Code of Australia 2022* and *Disability (Access to Premises – Buildings) Standards 2010*.

7.1.4. Amenity

Overshadowing and Solar Access

The site has several sensitive receivers in the surrounding area, including proposed new school site to the west and existing and future public open spaces. Given the tower nature of the proposal, an analysis and assessment of the overshadowing impacts and Solar Impacts will be undertaken. Preliminary assessments undertaken have noted that the proposal meets the overshadowing requirements for surrounding public spaces in accordance with clause 7.3 of the CB LEP and the CB DCP.

The CBLEP 2013 and CB DCP prescribes a series of solar access controls for public open spaces within the Rhodes Peninsula. Of these controls, two impact the development site. This applies to the future foreshore park and planned school opposite the site. The controls prescribe the following:

- **Foreshore Park** - No additional overshadowing to King George Park between 8:30am and 12:30pm mid-winter.
- **School open space** - No additional overshadowing of the future school open space between 10am and 2pm mid-winter.
- **George V Park** - No additional overshadowing to King George V Park between 8:30am and 12:30pm mid-winter

It is noted that the proposal results in some additional overshadowing of King George V Park. The proposed buildings in Stage 4 overshadow 19% of King George V Park at 12.30pm, and 5% of King George V Park at 12.00pm at mid-winter. The proposal will not result in any additional overshadowing of the Foreshore Park or future school open space during the times prescribed in the Planning controls.

A detailed overshadowing assessment will be prepared as part of the rezoning application and EIS for the SSD.

Existing Overshadow - 12:00pm 21st June

Existing Overshadow - 12:30pm 21st June

Proposed Overshadow - 12:00pm 21st June

Proposed Overshadow - 12:30pm 21st June

The site is adjacent to a number of different land uses within the Rhodes Precinct. A Noise and Vibration Assessment will be undertaken to determine the current and future noise environment (resulting from the proposed development). The existing acoustic environment is likely to be affected by the adjacent rail corridor and traffic on the local road network.

A Noise and Vibration Impact Assessment will be prepared in accordance with EPA guidelines and Australian/International standards in accordance with the SEARs. This assessment will be undertaken in accordance with applicable legislative requirements, policies and guidelines. The assessment will detail the following:

- ## Views and Visual Impact

The SSDA will be accompanied by a Visual Impact Assessment ('VIA'), which will assess the visual effects of the proposed built form on nearby sensitive receivers and public domain views from key locations

surrounding the site. The VIA will assess the cumulative impacts of the proposal alongside the other developments proposed in the surrounding area. The nature of the impact is both direct and cumulative and as such consideration will be assessed utilising a detailed level of assessment within the EIS.

The VIA assessment will consider the proposed building and its potential visual impacts when viewed from the surrounding area. The assessment will consider the proposed architectural and landscape treatments of the building and its immediate surrounds, which would include an assessment of the proposed layout and design in accordance with the following principles and best-practice approaches identified within the following documents (but not limited to):

- *Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition (LI/IEMA, 2013); and*
- *The Landscape Institute Advice Note 01 (2011) – Photography and Photomontage in Landscape and Visual Assessment.*

Wind

Given the location and arrangement of the buildings, the suitability of the pedestrian wind environment needs to be considered. A Wind Assessment will be prepared as part of the EIS to assess the impact of the proposal on pedestrians and surrounding areas. If required, mitigation measures will be incorporated within the detailed design of the building to ameliorate impacts. The proposal will be assessed against the Australasian Wind Engineering Society Quality Assurance Manual (AWES_QAM-2019).

7.1.5. Design Quality and Residential Amenity

Preliminary assessments against ADG show that the proposal is capable of meeting the design criteria for solar access and cross ventilation. A detailed assessment against all relevant ADG requirements will be prepared as part of the EIS.

Clause 7.2 of the CBLEP 2013 requires the undertaking of a competitive design process for a building higher than 28m or 8 storeys. Ordinarily, this requirement is satisfied prior to the preparation and lodgement of a detailed development application. However, the proposal finds itself in a unique set of circumstances, having now been accepted by the HDA for the progression of a concurrent rezoning and SSDA.

The HDA mandate sets out the following timeframes to achieving accelerated housing supply during the Housing Accord Period:

- Proponents must lodge an application within 9 months of SEARs approval.
- HDA targeting 275 days for issuing SSD and concurrent rezoning approvals.
- Proponents must commence construction within 12 months of approval.

The undertaking of a design competition, particularly at this scale, would eliminate any ability to meet these timeframes. Notwithstanding this, the proponent remains committed to achieving design excellence on the site, and accordingly this strategy seeks to fulfil the intention of the design excellence provisions within the CBLEP 2013 by setting out the processes for achieving a high-quality design outcome at the site, delivered by different architectural practices but with a coherent and logical overarching vision for the project.

Proposed Approach

An Alternative Design Excellence Strategy is proposed to support the detailed SSD for Stage 1 and will be provided to GANSW for endorsement following the issuing of SEARs. The purpose of the Alternative Design Excellence Strategy is to outline an alternative strategy to undertaking a competitive design process pursuant to clause 7.2 of the CB LEP 2013.

The Strategy is to be prepared in accordance with the requirements set by GANSW in a letter dated 17 April 2025. The Alternative Design Excellence Strategy will seek to demonstrate the proposal's capacity to meet GANSW's requirements to ensure high-quality architectural and urban design outcomes in line with best practice planning and design principles.

The GANSW has acknowledged the role of the site in accelerating housing delivery and has provided this opportunity to ensure that design excellence provisions do not undermine the intent and purpose of the HDA.

Noting the above, and in recognition of the size of the site and scale of the proposed development, a strategy including multiple architectural firms and a design review process is proposed, as detailed below.

Project team experience and recognition

The applicant has appointed two leading architect firms to deliver the stage one works for the precinct. These architects were selected for their extensive experience in the mixed use and residential uses. Each of these practises have proven to be the best suited to deliver the high design excellence standard required for the proposed precinct. Their ability to do so is demonstrated in the high calibre of their project portfolios, which includes award winning schemes.

SJB have been appointed to undertake the masterplan, and the detailed design of two buildings in the stage one works. The master plan will inform with concept SSDA and concurrent rezoning, determining the position, bulk and scale of individual buildings across the entire site. SJB will also prepare the architectural schemes for two buildings in the detailed design SSDA.

Furtado Sullivan has been appointed to undertake the remaining two buildings within the stage one detailed SSDA.

Landscape Architecture Firm, **Land and Form**, have been appointed to complete the landscaped components of the stage one detailed design SSDAs. This will ensure that while Furtado Sullivan and SJB will present unique architectural schemes, the built form will be tied together by common landscape elements, ensuring a level of continuity across the site.

Both Billbergia and SJB have played a significant role in shaping the Rhodes' existing character. Transforming the western side of the peninsula from an industrial precinct into a vibrant, mixed-use urban community. Beginning with the suburb's first regeneration master plan of the former Union Carbide Site (Precinct B) in 2005, SJB has since delivered several landmark projects that have reshaped the area's skyline and public realm. Notably, the Rhodes Central development - a \$2.5 billion precinct by Billbergia features five towers, including the 48-storey Peake Tower and the 45-storey Oasis, both designed by SJB. Billbergia's and SJB's extensive experience in Rhodes, and the addition of Furtado Sullivan will only strengthen the buildings and spaces delivered, ensuring that the precinct delivers a rich and varied scheme.

Project-Specific Design Review Panel

A Project Design Review Panel (DRP) will ensure design excellence across the site. Comprising GANSW approved and affiliated architects, urban designers, and sustainability experts, the panel will:

- Ensure design consistency, integration, and sustainability.
- Provide expert review and recommendations throughout planning and delivery.
- Align with HDA and GANSW design excellence requirements.

In accordance with the guidelines, the panel members will be nominated by the following:

- **GANSW:** 1 panel member. Panel Chair
- **City of Canada Bay Council:** 1 panel member.
- **Applicant** (Leeds Investments Pty Ltd): 1 panel member.

7.1.6. Hazards and Risks

Land Contamination

A Detailed Site Investigation is to be prepared for the SSDA and rezoning application. The purpose of the DSI is to assess the extent of contamination at the site and the potential impact it could have on the redevelopment of the site for residential / commercial purposes. The DSI is to confirm if the soils at the site are considered suitable for the use of the site for a mix of high rise residential and commercial land and if mitigation measures need to be recommended including but not limited to, the preparation of a Remediation Action Plan, an Acid Sulphate Soil Management Plan, HAZMAT Survey and further testing, together with future ecological risk assessments.

Acid Sulphate Soils

The site is also identified as having potential Class 2 and Class 5 Acid Sulphate Soils. Given the extent of excavation for the basement levels, Acid sulphate soils will be a consideration. An Acid Sulphate Soil Management Plan will be prepared.

Coastal Hazards Management

The site is located along the foreshore of Parramatta River. Under the Resilience and Hazards SEPP, the site is mapped as being within both the 'Coastal Use' and 'Coastal Environment' Areas. Consideration of coastal hazards such as erosion and impacts on the waterway will be included within the EIS submitted with the SSDA.

7.1.7. Heritage

Non-Aboriginal Heritage

As noted in above, the site is not listed as a heritage item, nor is it located within a heritage conservation area. A Heritage Impact Statement is to be prepared to consider the impacts of the proposal on items of heritage significant in the vicinity of the site, notably:

- Meadowbank rail bridge over Parramatta River (State Significant) Item 01189.
- Meadowbank rail bridge over Parramatta River (Local) Item I542.
- Uhr's Point Reserve (Local) Item I117.
- Ryde Bridge street trees (Local) Concord Road (Ryde Bridge approach) I116.
- 14 Cavell Avenue, Rhodes (Local) I77.
- Cavell Avenue Street Trees (Local) I79.

Aboriginal Heritage

In accordance with the standard requirement of SSDs, an Aboriginal Cultural Heritage Assessment Report ('ACHAR') will be prepared. The ACHAR will document the process of investigation, Aboriginal community consultation and assessment with regards to Aboriginal cultural heritage and Aboriginal archaeology. The assessment will be prepared in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (Department of Environment, Climate Change and Water).*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (Office of Environment and Heritage 2011)*
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW)*
- *The Australia ICOMOS Charter for Places of Cultural Significance.*

No Aboriginal objects or Aboriginal places are registered within the subject site.

7.1.8. Waste Management

The proposal will generate several waste streams that will require management in accordance with relevant legislation and guidelines. It is expected that during demolition and construction, the primary waste generated would consist of excess building products and onsite material.

Operational waste is likely to be constrained to waste associated with human use such as general solid waste and sewerage. A Waste Management Plan is to be prepared to support the Detailed SSDA component. The plan is to address both the construction and operational phases of the development and indicates the collection points and method of removal from the site, include the various waste streams from the different uses proposed.

7.1.9. Infrastructure Servicing

The site is within an area which has established infrastructure and services. The site would be cleared of all existing buildings prior to the commencement of the earthworks. Remaining infrastructure at the site would primarily consist of utility infrastructure connections including water and electricity. The EIS will detail the infrastructure requirements and will include information about anticipated supply of utility services including:

- Electricity
- Gas
- Water
- Sewer
- Telecommunications

A Dial Before You Dig assessment would also be carried out as part of the EIS, to determine the locations of other utility supplies. The need for utility works to support the proposal would be identified during the design development and in consultation with relevant providers. The need for any works to adjust utilities will be assessed as required within the EIS. The EIS will be accompanied by a Utility Services and Staging Plan.

7.1.10. Economic and Social Impacts

The site is surrounded primarily by light industrial and low-density residential uses. It is anticipated that the mixed-use development would deliver social and economic benefits associated with the delivery of a key site in the planned precinct, in addition to the creation of job opportunities. The EIS will be accompanied by a Social Impact Assessment which will include an analysis and assessment of the potential social and economic impacts of the proposal.

This would include an estimation of the employment generation associated with the construction and operational phases, as well as broader economic benefits of this specific development. Other social amenity impacts would be assessed including noise, landscape, traffic generation and visual impact.

7.1.11. Environmentally Sustainable Design

An Ecologically Sustainable Development ('ESD') Report will be provided as part of the EIS and include details on how ESD principles will be incorporated within the design and ongoing operational phases of the proposed development.

This assessment will identify potential measures to be implemented into the building design and construction to minimise the environmental footprint of the development, including opportunities to avoid or minimise the demand for water and electricity. The EIS will be accompanied by an ESD report.

7.1.12. Biodiversity

A desktop review of the site shows some existing vegetation on the site. This vegetation will be required to be removed to accommodate the proposed development. The Arboricultural Impact Assessment is to be prepared to assess the impact on any significant trees identified.

A Biodiversity Assessment is to be prepared to support the EIS and to ensure that any impacts on flora and fauna proposed are managed.

7.1.1. Flooding

The site is identified in the Rhodes East Priority Investigation Area Hydrology and Flooding Report, prepared by Jacobs and dated 21 December 2016 as being a 'flood planning area' and is subject to flood related development controls. There are no significant areas subject to high hazard in the 100 year ARI flood event. The flood planning area (FPA) has also been delineated using the 100 year ARI flood level plus 0.3m freeboard. The 3m AHD level has also been included in this area to account for inundation from Parramatta River (100 year ARI tide level plus allowances for sea level rise and freeboard).

The Jacobs 2016 report found that there are no significant areas of high flood hazard in the 100 year ARI flood. There are, however, several locations that are impacted by stormwater flooding in the 100 year ARI event. These are outlined below and identified Figure 37 and include a low point in Leeds Street where the

cul-de-sac at the end of Leeds Street is subject to inundation. It is noted that the Jacobs Flood Study identifies that the Leeds Street low point could be addressed through upgrades to the drainage infrastructure in this area through the provision of culverts or a swale incorporated in an open space area or drainage easement.

A Flood Impact Assessment is to be prepared for the SSD and rezoning application. The Flood Impact Assessment Report is to identify existing flood behaviour at the site, an assessment of the flood risk post development and an assessment of the development against the relevant flood development controls. The assessment is to include recommendations for the relevant finished floor levels for ground floor retail tenancies / residential dwellings and basement carpark entries.

Figure 35 – 100 year ARI provisional flood hazard map



Source: Rhodes East Priority Investigation Area Hydrology and Flooding Report, Jacobs, 21 December 2016

Figure 36 – PMF provisional flood hazard map



Source: Rhodes East Priority Investigation Area Hydrology and Flooding Report, Jacobs, 21 December 2016

Figure 37 – Flooding Areas of Concern



Source: Rhodes East Priority Investigation Area Hydrology and Flooding Report, Jacobs, 21 December 2016

7.2. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

This section of the report identifies the matters that do not require further assessment in the EIS. Each of these matters was considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

7.2.1. Aviation

The proposal will be assessed against the OLS / PANS-OPS for both Bankstown Airport and Sydney Kingsford Smith Airport. Any temporary or permanent structures that protrude into the OLS / PANS-OPS will require approval from the Civil Aviation Safety Authority (CASA).

7.2.2. Bushfire

The site is not mapped within a bushfire prone area of a buffer zone to a bushfire prone area. As such a bushfire assessment is not considered necessary for this Project due to its setting in a highly urbanised and developed area, devoid of remnant bushland and not within a mapped bushfire prone area'.

7.2.3. Air Quality and Odour

The project (for 'residential flat buildings, 'shop top housing' and 'retail premises') will not generate any consequential air quality impacts related to atmospheric emissions, gases or particulate matter, or any ongoing odour sources.

7.3. SUMMARY OF ASSESSMENT MATTERS

The Leeds Street and Averill Street Rhodes HDA Declared SSD is significant project involving the redevelopment of former industrial land on the Parramatta River foreshore. The experience working on other SSD projects in the Rhodes Precinct, including the adjoining site at 25-27 Leeds Street, has informed this preliminary review of the site and the proposal to help identify the key assessment matters to be addressed in the planning applications. Our preliminary review of key assessment matters has informed our understanding of the scope of work for the project consultant team are summarised in the following tables:

7.4. REZONING APPLICATION

Table 15 – Key Assessment Matters for Rezoning Application

Assessment Matter	Description	Deliverables
Strategic Planning	The Strategic Planning issues to be addressed: - Identifies the existing planning framework (State and Local), applicable strategic plans, key planning issues and relevant background - Assesses the proposed planning framework against relevant State and local strategic plans, strategies and policies - Considers adjacent existing and current planning proposals and strategies within the local area - Outlines the vision and priorities for the site - Responds to the SEARS/Study Requirements - Explains and justifies the proposed approach to the rezoning proposal, planning controls, development standards (height, FSR) - Identifies and addresses the implications of any proposed land uses, including analysis for any employment uses Summarises the key outcomes of the various studies undertaken and how these have informed the planning controls for the site.	Strategic Planning Report
Explanation of Intended Effects (EIE) (if not prepared by the DPHI)	An EIE will be required to identify the draft amendments to planning controls for the site including, but not limited to the proposed and existing: - Zoning - Maximum height of buildings - Maximum FSR - Car parking - Maximum number of dwellings - Minimum building separation distances - Site specific provisions and/or other relevant planning controls	Explanation of Intended Effects (EIE)
Transport and Traffic	The Rhodes Place Strategy and supporting Infrastructure Schedule identified the necessary road upgrades to support development in the precinct over the next 20 years. New local roads, upgrades to state roads and new and improved cycling and walking links support the Rhodes Place Strategy. Transport and traffic modelling for the Rhodes Place Strategy indicated that 3,000 dwellings was the limit of additional dwellings that can be supported without major intervention. The Place Strategy and planning controls at Clause 7.7 of the CBLEP 2013 include a provision a maximum of 3,000 new homes. The Place Strategy identifies capacity for approximately 4,200 dwellings in the Precinct and sets out actions and considerations to unlock the Precinct's full growth potential. The proposal seeks to deliver approximately 2,000 dwellings, exceeding the dwelling provision by approximately 1,100-1,200 dwellings. The planning proposal will need to proposal the exclusion of the site form the dwelling cap or removal of the dwelling cap. To support this is needs to be demonstrated to the satisfaction of TfNSW and the DPHI that additional transport capacity is committed.	Transport and Traffic Impact Assessment

Assessment Matter	Description	Deliverables
	It is understood from initial discussions with DPHI that TfNSW has been consulted and have some key issues and requirements related to demonstrating additional transport capacity. Rather than requiring a new transport management and accessibility plan, or similar, a traffic and transport assessment to support the application, would provide a targeted assessment of the transport capacity for supporting the additional dwellings proposed, including: • Provide details on the approximate trip generating potential of the various land uses across the day and week • Provide an understanding of the travel behaviours and patterns (all modes) of visitors and residents of the proposal • Identify and assess the impacts resulting from the proposal with an appropriate level of transport analysis for all modes, and leveraging traffic analysis undertaken by TfNSW • Provide details of the proposed transport infrastructure and servicing improvements required to support the proposal and the capacity of transport infrastructure (especially the T9 Northern Line) to accommodate the additional dwellings • The proposed approach to pedestrian and bicycle facilities, car parking; and access and egress requirements	
Urban Design	Urban Design issues to be addressed in the rezoning application include: • Detailed site and context analysis that identifies the strategic context, current strategic projects surrounding the precinct, opportunities, constraints and key issues to be considered • Urban design principles that underpin the proposed development • Detailed master plan that integrates all other urban design related requirements and demonstrates that the proposed Gross Floor Area (GFA) to be included in the planning framework can achieve high quality place outcomes • Proposed land uses including, but not limited to, approaches to residential diversity (housing types, apartment mix), assessment of retail uses, community uses and public open space/public recreation • Ensure master plan is design-led, optimising Rhodes Precinct opportunities, responds to constraints creatively • A height and building setback strategy to assist in determining building height controls including height transitions, building typologies, building envelope plans, required sun access planes, building separation, massing and key views and vistas • Proposed maximum building heights, building envelopes, FSR controls, and yields testing • Overshadowing, wind and solar access analysis of the public domain, residential buildings and impacts to adjacent neighbouring areas including general considerations of consistency with the ADG and Housing SEPP • Address the GANSW 'Better Placed' guidelines	Urban Design Report
Connecting with Country	In July 2023, the NSW Government released the Connecting with Country Framework, building on the draft framework released in 2020. This is a framework for developing connections with Country that can inform the planning, design, and delivery of built environment projects in NSW. This framework applies to State Significant Development and will need to be implemented in the design of the proposal. Prepare a Designing with Country Framework, in consultation with the GANSW to embed Country into the rezoning. The Designing with Country narratives and themes that emerge from the Framework should be interwoven throughout the master plan, especially as planning pathway is for a State Significant Development.	Connecting with Country Strategy

Assessment Matter	Description	Deliverables
Design Excellence	Prepare an Alternative Design Excellence Strategy in accordance with the State Significant Development Design Competition Exemption – Terms of Reference that: - Ensures design excellence is achieved across all future development stages - Undertake consultation with the DPHI and GANSW to gain endorsement for the alternative design excellence approach, in the form of a Design Review Panel	Design Excellence Strategy
Public Domain and Open Space	The proposal includes a total of 16,325 sqm of open space, including additional foreshore open space and recreation areas. High quality spaces will complement the new residential developments. A Public Domain and Open Space Strategy should include: - A vision statement and a series of goals to achieve the vision - A detailed site and context analysis that identifies strategic context, opportunities and constraints and key issues to be considered - The proposed hierarchy of open space and public domain typologies - A separate chapter focusing on public domain, specifically what currently exists, planned upgrades and new public space; - Opportunities for interpretation of the cultural and heritage setting of the area and how this will be protected and conserved; - A set of open space principles complementing the urban design principles - A movement plan identifying proposed movements to be captured through the precinct (reflecting Movement and Place principles) setting out the proposed movement corridors and connectivity network throughout and adjacent to the site, the types of movements to be captured through the site (i.e. walking, cycling, and vehicles). Identify how public spaces and green spaces could play a role in movement and include emphasis on creating strong pedestrian corridors linking outside areas to the site and to the river foreshore including access to the water. - The movement plan should promote connections to and through the site to the foreshore and future ferry wharf and long the foreshore, and to planned community facilities, and the future Rhodes Public School. - Identify how ground level activation will occur in key locations of the precinct plan, around squares, public space and the complementary uses of those areas through a 24/7 cycle. - A landscape master plan for the precinct locating public space (open space, plazas, squares, recreation) that have been derived from site analysis, benchmarking assessment and urban design principles. The master plan is to include (but not limited to) public space connections, shade, deep soils zones, soil volumes + quantum, urban tree canopy outcomes and targets, Water Sensitive Urban Design principles, planting schedule suitable for the precinct with the inclusion of native and remnant vegetation, Parramatta River foreshore vegetation, and street tree planning.	Public Domain and Open Space Strategy
Infrastructure and Development Contributions	As part of the Rhodes Place Strategy new and upgraded infrastructure was identified to support the renewal of Rhodes over the next 20 years, including the following items of direct relevance to the proposal: - Concord Road public domain upgrades - Concord Road/Averill Street intersection upgrade - Leeds Street upgrade - Cavell Avenue upgrade - Cavell Avenue/Averill Street intersection upgrade - Cavell Avenue/Leeds Street intersection upgrade	Infrastructure Funding and Delivery Strategy

Assessment Matter	Description	Deliverables
	- Widening of railway underpass (subject to further investigation) - Leeds Street (east) pedestrian link extension to foreshore - Averill Street to Leeds Street link embellishment - Cavell Avenue pedestrian link extension to foreshore - Leeds Street foreshore park and promenade. - Rhodes ferry wharf The Rezoning Application should include a review of the infrastructure and servicing needs of the site and provide updated details of new and upgraded infrastructure to be provided to support the increase in dwellings. The <i>Environmental Planning and Assessment Amendment (Housing and Productivity Contributions) Bill 2023</i> was assented on 13 July 2023, which changed how contributions for regional infrastructure are levied, by establishing a Housing and Productivity Contribution (HPC). Regional infrastructure includes public amenities or public services, affordable housing, transport infrastructure, regional or State roads and measures to conserve or enhance the natural environment. The contribution rate for residential flat buildings in the Greater Sydney Region is \$10,000 per dwelling or lot. The contribution rate for commercial/ retail land uses is \$30 per square metre of new gross floor area. The City of Canada Bay Local Infrastructure Contributions Plan 2022 sets out development contributions for local infrastructure. A schedule of State/regional and local infrastructure required to meet the needs of the proposal should be included that identifies the ownership and maintenance responsibilities and costs of the infrastructure proposed to be dedicated to Council and identifies the proposed contributions framework and any development staging to deliver State and local infrastructure and any works-in-kind proposals.	
Affordable Housing	Clause 6.12 of the CBLEP 2013 outlines the affordable housing contribution which applies to the land. The rate that is applied to Rhodes East is 5% of total residential GFA. This is outlined in the City of Canada Bay Affordable Housing Contribution Scheme 2021. This contribution can either be made in kind with the dedication of 5% of the residential GFA as affordable housing or the equivalent monetary contribution.	Affordable Housing Contribution proposal
Utilities and Infrastructure Servicing	A Utilities and Infrastructure Servicing Report will be required to include the following: - The existing situation, including constraints, opportunities, key issues and existing network capacity - Assesses the capacity of the relevant service infrastructure networks to service the Precinct, impacts on the networks resulting from the proposal and identify any augmentation and servicing options proposed to support the proposal (including staging) - Demonstrate that satisfactory arrangements for drinking water and wastewater services can be made. - Investigate, in consultation with Sydney Water, the level of wastewater network amplification that will be required, and the integration and timing of this - Obtain endorsement and/or approval from Sydney Water to ensure that any future development does not adversely impact on any existing water, wastewater or stormwater mains, or other Sydney Water asset, including any easement or property.	Utilities and Infrastructure Servicing Report
New Ferry Wharf Interface	The precinct may include a new ferry wharf to be delivered by TfNSW, with Leeds Investments Pty Ltd facilitating access through the site. Potentially ferry commuter parking may be required within the precinct.	

Assessment Matter	Description	Deliverables
	To this end Leeds Investments Pty Ltd may enter into a Memorandum of Understanding with TfNSW, which outlines each party's responsibilities when and how those works occur. The Urban Design and Public Domain Concept Plans are to demonstrate how access to the future ferry wharf is to be provided.	
Consultation	Community and stakeholder consultation will be undertaken in the preparation and assessment of the concurrent Rezoning Application and SSDA, including: • Key Stakeholders: it is proposed to consult with the following stakeholders during the preparation of the EIS: ○ City of Canada Bay Council ○ Agencies, including TfNSW ○ DPHI, including GANSW ○ Surrounding residents, businesses and local community groups • Other Interested Stakeholders: additional stakeholders may be identified during the preparation of the Rezoning Application and and EIS/SSDA. Community participation objectives are included in the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. An engagement consultant should be responsible for monitoring, reviewing and adapting the effectiveness of the engagement strategy to encourage community participation in the Project. A Consultation Outcomes Report that includes evidence of consultation and provides a summary of and outline the general outcomes of pre-lodgement consultation is required for the concurrent SSDA and rezoning application.	Consultation Outcomes Report

7.5. CONCEPT SSDA WITH DETAILED SSDA FOR THE FIRST STAGE

Table 16 –Key Assessment Matters for Concept SSDA with Detailed SSDA for the first stage

Assessment Matters	Description	Deliverables
Statutory Context	All relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines. Identify compliance with applicable development standards (as aligned with the proposed amendments to CBLEP 2013).	Environmental Impact Statement
Estimated Development Cost and Employment	The Concept DA is to include an estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report. The EDC Report must specify the EDC of the Concept and Detailed components of the SSD, An estimate of the retained and new jobs that would be created during the construction and operational phases of the development is required.	EDC Report
Land Use and floor space potential	The EIS will include a detailed description and analysis of all land uses proposed under the Concept SSDA and the proposed gross floor area that could be achieved This will enable future development stages on the site to comply with the maximum FSR controls set by the LEP Amendment and clearly	Environmental Impact Statement

Assessment Matters	Description	Deliverables
	define the type and intensity of land uses which will be proposed to be delivered on the site.	
Transport and Traffic	The Concept SSDA proposal will have an impact on the local and regional road network, and public transport and active transport. Development will generate travel demands within and outside of the Rhodes Precinct. An assessment of the transport and traffic impacts is required to include: • Traffic impacts on the surrounding road network and intersection performance, during construction and operation of the proposal • Site access arrangements and the design and operation of the proposed car parking • The demand for car parking • Details of existing and proposed vehicular and bicycle access and car/bicycle parking arrangements for workers and visitors (as relevant) • Loading and servicing arrangements for the proposal • Pedestrian and cycle connections/circulation and required upgrades to meet the likely future demand, and connections to the broader network • Existing and proposed public transport services (including the new ferry wharf) Opportunities to improve public and active transport and promote sustainable transport initiatives, including through the preparation of a Green Travel Plan.	Transport and Traffic Impact Assessment Green Travel Plan
Urban Design and Built Form	The EIS will need an assessment of the height, density, bulk and scale of the proposed development within the context of the locality and will demonstrate how the proposal integrates with the local environment and the desired future character of the area. The EIS will also need to address how the form, layout and siting of the buildings as identified by the Concept Plan achieves optimal design and amenity outcomes. This includes consideration of compliance with the maximum height of buildings controls in the LEP Amendment. The Detailed SSD component will need to demonstrate consistency with the Concept SSD application in terms of land use, floor space and built form.	
Design Quality and Design Excellence	Demonstrate how the development will achieve design excellence in accordance with the CBLEP 2013 and how the proposal achieves good design in accordance with the objectives in Better Placed. Detail measures to ensure design integrity is maintained in subsequent stages. These matters are to be addressed in the Alternative Design Excellence Strategy. Prepare a Design Review Report to include all design advice and a record outlining how the issues raised by the Panel have been addressed.	Design Review Panel
Environmental Amenity	The EIS will need to demonstrate that the building envelopes proposed as part of the Concept Application are capable of delivering residential development consistent with the Housing SEPP as well as the provisions of the NSW Apartment Design Guide (ADG). A detailed assessment against the ADG will be required for the Detailed SSD component.	Design Verification Statement ADG Assessment

Assessment Matters	Description	Deliverables
	Amenity impacts on the surrounding locality, including lighting impacts, reflectivity, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts are to be assessed.	
Impacts on adjoining properties	Given proximity to neighbouring residential development and the future Rhodes Public School, a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development, will be required. The EIS will need to consider and assess impacts on adjoining properties, particularly adjoining residential properties and open space and the adjacent Rhodes Public School site. This assessment will consider the impacts in relation to solar access (as noted above), view loss and privacy and how these impacts can be mitigated as part of development of future stages.	Shadow diagrams
Visual Impact	Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. A visual impact assessment that addresses the impacts of the development on the existing visual catchment, may be required.	Visual Impact Assessment
Public Domain, Trees and Landscaping	A public domain and landscaping concept plan will be submitted with the EIS and conceptually outline any new and upgraded public open space and proposed treatment and landscaping of public domain areas. Concept plans for significant areas of public domain such as parks, plazas and streetscapes which incorporate safety, public art, interface treatments, sustainability and Water Sensitive Urban Design features. An assessment of the condition and significance of existing trees to be removed and retained will be required. An Indicative Implementation and Staging Strategy that identifies how staging may occur; includes details of how the delivery of public domain and infrastructure will be considered and coordinated across individual development sites and considers construction staging.	Public Domain Plan Landscape Concept Plan Landscape Design Report
Infrastructure and services	In consultation with relevant service providers the Concept SSDA is to assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. The assessment will need to identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure to upgrades will be implemented on time and be maintained, and provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	
Ecology and Biodiversity	The <i>Biodiversity Conservation Act 2016</i> protects native vegetation, species of threatened flora and fauna, endangered populations and endangered ecological communities and their habitats in NSW. Section 7.9 requires a development application for SSD to be accompanied by a Biodiversity Development Assessment Report (BDAR), unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The likely impacts of the proposed development on biodiversity values will be assessed in a BDAR, which will accompany the EIS unless a BDAR waiver is sought and granted for the proposal.	BDAR or BDAR Waiver

Assessment Matters	Description	Deliverables
Heritage	The site is adjoining by an item of heritage significance on the Concord Road frontage. It is understood the proposal will not disturb this heritage item. A Statement of Heritage Impact will be required to assess the development in the vicinity of the heritage item.	Statement of Heritage Impact
Aboriginal Cultural Heritage	An Aboriginal Cultural Heritage Due Diligence Report or Aboriginal Cultural Heritage Assessment Report (ACHAR) is to be prepared to address requirements under the <i>National Parks and Wildlife Act 1974</i> , <i>Heritage Act 1977</i> and the <i>Environmental Planning and Assessment Act 1979</i> and is to be written in accordance with the <i>Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW</i> .	Aboriginal Cultural Heritage Due Diligence Report or Aboriginal Cultural Heritage Assessment Report (ACHAR)
Contamination and Acid Sulphate Soils	Earthworks will be required as a part of the proposal. Jacobs completed a Contamination and Acid Sulphate Soils Report for the Rhodes East Priority Investigation Area in 2016 to support the preparation of a precinct plan for the DPHI. The investigation focussed on the land around Leeds Street in Rhodes which at the time as zoned General Industrial (IN1). The objective of the investigation was to identify contamination issues that might have a material impact on the rezoning investigation and planning proposal. Material impacts were considered to be contamination issues that could preclude certain uses of the land, significantly extend the timeframe for development or potentially compromise the economic viability of the proposed land use. The purpose of the 2016 investigation was not to identify all contamination that might be present across the Rhodes East Investigation Area noting that additional investigations and risk assessment will be required as part of future development applications, in accordance with State Environmental Planning Policy 55 and the City of Canada Bay Council's Contaminated Land Policy. A Detailed Site Investigation is expected to be required and include mitigation measures including, the preparation of a Remediation Action Plan (where remediation works are required and proposed with the SSDA), an Acid Sulphate Soil Management Plan, HAZMAT Survey and testing, together with human health and ecological risk assessments to mitigate any risks of contamination and remediation works associate with the proposal.	Detailed Site Investigation Acid Sulphate Soils Management Plan HAZMAT Survey
Groundwater conditions	The site is located close to the Parramatta River. It is anticipated that an assessment of the potential impacts on surface and groundwater resources (quality and quantity), including related infrastructure, hydrology, aquatic and groundwater dependent ecosystems, drainage lines, and the Parramatta River.	Geotechnical and Groundwater Monitoring Assessment
Noise	The site is located between Concord Road and the T9 Northern Line. A Noise Impact Assessment will be required to accompany the EIS and will assess the potential noise impacts and associated mitigation measures. This will need to include consideration of noise impacts associated with the T9 Northern Rail Line and Concord Road in accordance with the Development Near Rail Corridors and Busy Roads Interim Guideline. The Detailed SSD component will need an assessment of construction noise and vibration impacts.	Acoustic Impact Assessment
Ecological Sustainable Development	The EIS will need to address the principles of ecologically sustainable development in relation to the project and set out an ESD strategy that will be incorporated into future stages of development.	

Assessment Matters	Description	Deliverables
	The provisions of the BASIX SEPP and other relevant ESD and building sustainability guidelines will also be addressed in future stages of development. The Detailed SSDA component will include a BASIX certificate and demonstrate compliance with any other aspects of the wider sustainability strategy.	
Stormwater and Flooding	The site is not mapped as flood prone on the LEP map. However, is identified in the Rhodes East Priority Investigation Area (Rhodes Place Strategy) Hydrology and Flooding Report as being a 'flood planning area'. A flood assessment was undertaken for the adjoining Leeds Investments Pty Ltd site at 23-27 Leeds Street for a Regional DA and SSDA for in-fill affordable housing. This scheme was deemed to be compliant with the relevant controls of the DCP. The flood assessment will be required to support the SSDA.	Flood Assessment
Waste Management	The proposal to generate waste during demolition, construction and operational phases. A Waste Management Plan will need to be submitted with the EIS for the Concept SSDA to outline the management arrangements for the waste generated as part of the proposed development, including high level consideration of storage, collection points and method for removal. Detailed Operational and Construction Waste Management Plans will be provided with the Detailed SSDA component.	Detailed Operational and Construction Waste Management Plans
Social impact	The land uses and density proposed will have impacts on existing Rhodes community. A Social Impact Assessment prepared in accordance with the Social Impact Assessment Guideline will be required.	Social Impact Assessment
Crime Prevention	This large mixed use development will be assessed against CPTED principles aimed to reduce victimization, deter offender decisions that precede criminal acts, and build a sense of community among the future community so they can gain territorial control of areas, reduce crime, and minimize fear of crime.	CPTED Assessment
Staging	Details of how construction and operation would be staged. The EIS will need to assess the staging of the built form, open space and infrastructure required to support the proposal.	Staging Plans
Construction Management	The EIS will need to consider and address construction impacts such as noise and vibration and access, parking and traffic associated with the Detailed SSD component.	Demolition Statement Construction Management Plan

8. CONCLUSION

This Scoping Report has been prepared on behalf Leeds Street Developments Pty Ltd . It constitutes a request for SEARs to guide the preparation of an EIS that will accompany a SSDA for the mixed-use redevelopment of the site. It has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project.

In accordance with the HDA program, a separate but concurrent Planning Proposal will be submitted, which seeks to amend provisions in the CBLEP 2013. A separate Rezoning Report will be submitted as part of the SSDA and concurrent Rezoning Application package to support this amendment.

We trust that the information detailed in this report is sufficient to enable the Secretary to issue SEARs.

9. DISCLAIMER

This report is dated 23 July 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Leeds Investment Pty Ltd (**Instructing Party**) for the purpose of Scoping Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

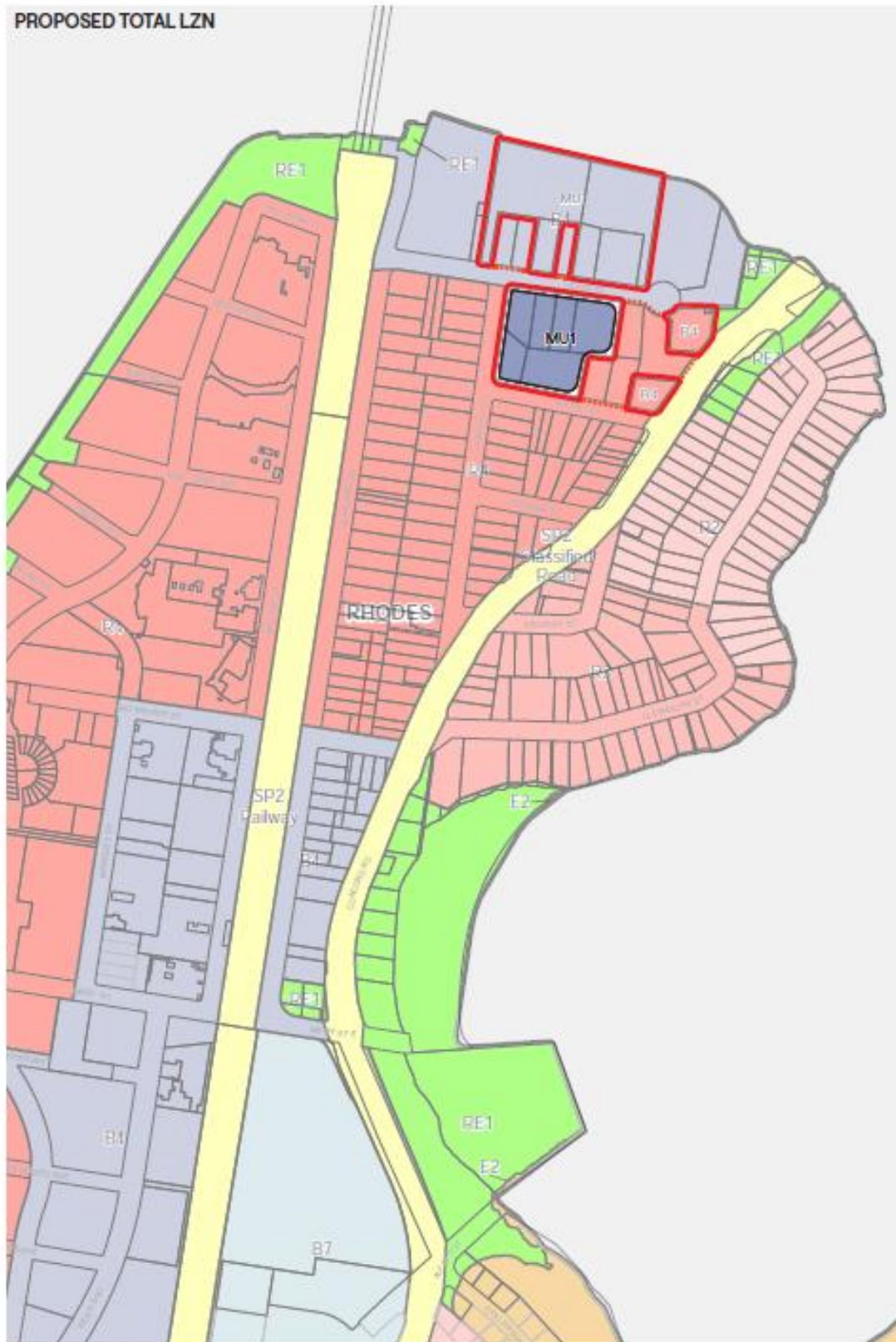
Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

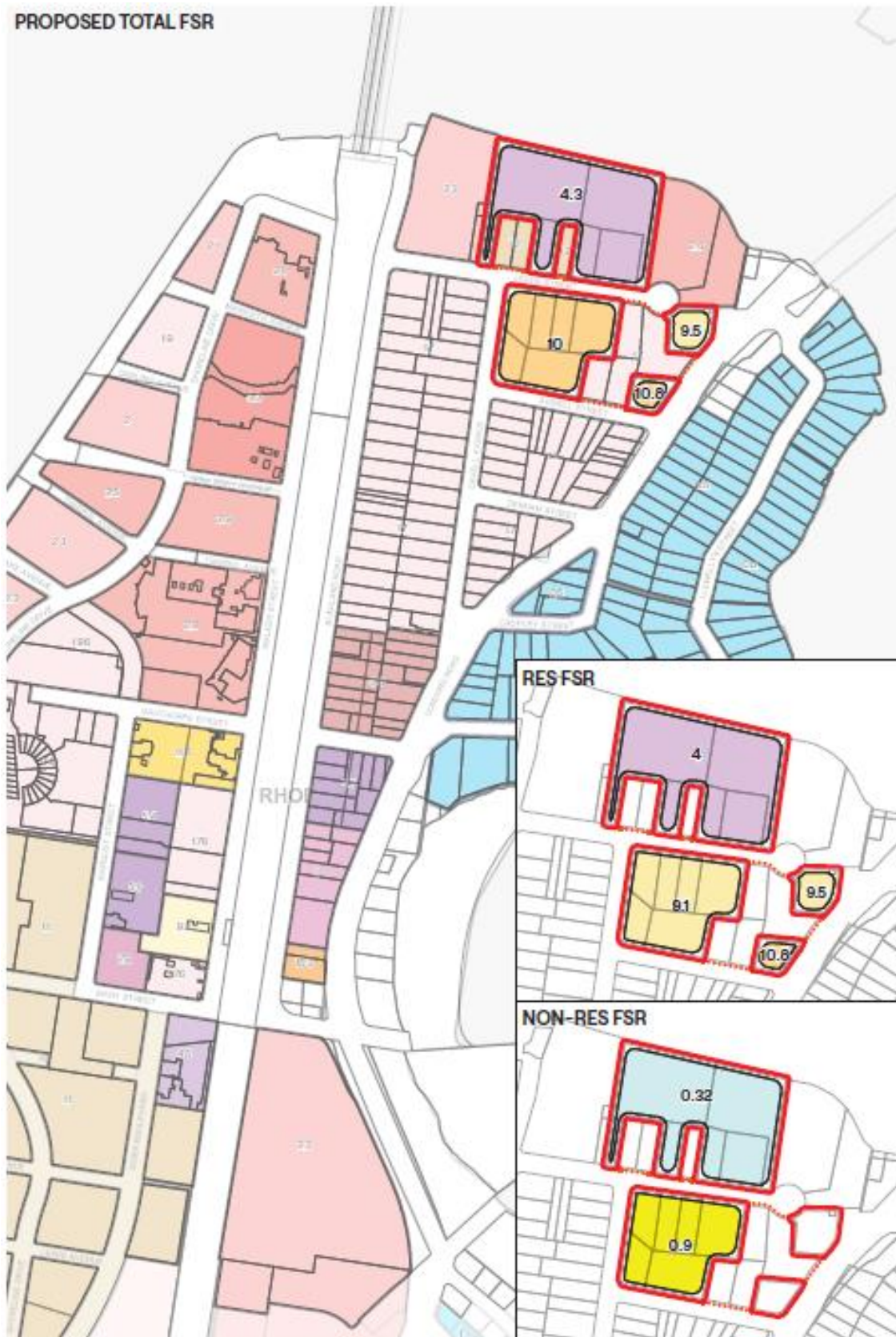
APPENDIX A URBAN DESIGN REPORT

APPENDIX B STATUTORY MAPS

PROPOSED TOTAL LZN



PROPOSED TOTAL FSR



RES FSR



NON-RES FSR



