

Scoping Report

*Stage 3 – Leeds and Averill
Streets, Rhodes – HDA Declared
SSD*

Urbis staff responsible for this report were:

Director	Murray Donaldson
Associate Director	Belinda Thomas
Senior Consultant	Sarah Noone
Consultant	Sally Flannery
Project Code	P0058999
Report Number	Scoping Report – Final

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Ltd
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.
You must read the important disclaimer appearing within the body of this report.

urbis.com.au

Contents

1	Introduction	4
1.1.	Applicant Details	4
1.2.	Site details	4
1.3.	Project Overview	4
1.4.	Project Description	5
1.5.	Background to the Project	5
2	Strategic Context	10
3	The Site and Surrounds	14
4	The Project	19
4.1	Project Overview	19
4.2	Project Description	19
4.3	Relationship to SSD-89441959	19
4.4	Detailed Development Description	21
5	Statutory Context	23
5.1	Statutory Requirements	23
5.2	Pre-Conditions	23
5.3	Mandatory Considerations	32
6	Community Engagement	37
6.1	Engagement Carried out	37
6.2	Engagement to be Carried out by the Applicant	37
7	Proposed Assessment of Issues	39
7.1	Matters Requiring Further Assessment in the EIS	39
7.2	Matters Requiring No Further Assessment in the EIS	43
8	Conclusion	45
	Disclaimer	46

Figures

Figure 1 – Site Aerial Photograph.....	7
Figure 2 – Stage 3 – Averill Street and Leeds Street Precinct Master Plan.....	8
Figure 3 – Site Map.....	17
Figure 4 – Local Context Map	17
Figure 5 – Concurrent Concept SSDA with Detailed SSDA for the first stage and rezoning application	20
Figure 6 – Zoning Map.....	29
Figure 7 – Height of Building Map (Stage 3 site outlined with a thin red line)	29
Figure 8 – FSR Map	30
Figure 9 – Heritage Map	30
Figure 10 – Foreshore Building Line Map.....	31

Tables

Table 1 – Applicant Details	4
Table 2 – Site Details	4
Table 3 – Project description	5
Table 4 – Site Area, Proposed GFA, Proposed Units and Car Parking.....	5
Table 5– Site Details (SSD-89441959)	6
Table 6 Consistency of the Project with Relevant Strategic Plans	10
Table 7 – Key Features of Site and Locality	14
Table 8 Project description	19
Table 9 – Identification of Statutory Requirements for the Project.....	23
Table 10 – Pre-Conditions.....	23
Table 11 – Mandatory Considerations.....	32

1 Introduction

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

The site is located within the City of Canada Bay Local Government Area (**LGA**) and on land in Zone MUI Mixed Use 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 MUI (Mixed Use) zone. This application seeks consent for the detailed design and construction for Stage 3 of the Concept SSDA with rezoning application for the Averill and Leeds Street, Precinct project (SSD-89441959).

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the background to the proposal and relationship to other proposals in the Rhodes Precinct.

1.1. Applicant Details

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

Table 1 – Applicant Details

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, Partner (Urbis) P: (02) 8233 9900 E: mdonaldson@urbis.com.au

1.2. Site details

Table 2 provides the address and legal description and land area of the land.

Table 2 – Site Details

Site Details	Title Reference
7 Leeds Street, Rhodes	28/547201
9-11 Leeds Street, Rhodes	1/717645
13 Leeds Street, Rhodes	13/239579
	(3 Lots in Total)

1.3. Project Overview

The subject site is located within the Leeds Street and Averill Street Precinct, which has been declared SSD. The Stage 3 project is a part of a landmark mixed-use development that integrates public open spaces, high-quality housing and essential services into a vibrant mixed-use and residential area with public foreshore access to a revitalised Parramatta River foreshore.

Key features of the Stage 3 development proposal include:

- 573 new dwellings, addressing housing needs.
- 2828 sqm non-residential floor space
- 5438 sqm of public open space for recreation.

1.4. Project Description

Table 3 – Project description

Key Element	Proposal
Stage 3 Development Detailed SSDA	- Demolition of existing structures and excavation followed by the construction of 2 x mixed-use towers ranging from 27 to 44 storeys, which will accommodate 573 apartments and 2828sqm of non-residential GFA. - Provision of 5438 sqm of landscaped public domain including a foreshore park and pedestrian links. - Approximately 796 car parking spaces. - Vehicle access from Leeds Street
Affordable Housing	Monetary contribution equivalent to 5% of the residential floor space.

Table 4 provides the proposed stages of the development including land uses, GFA and car parking.

Table 4 – Site Area, Proposed GFA, Proposed Units and Car Parking

Stage	Site Area sqm	Proposed GFA sqm	Units	Car Parking
3a residential GFA		34,882	353	
3b residential GFA		20,217	204	
Non-residential GFA		2,828		
Total	9084	59,391	573	796

1.5. Background to the Project

The proposed Stage 3 Works is part of the larger precinct renewal project at the northern end of the Rhodes peninsula. Developers Billbergia, the parent company of Leeds Investment 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 Investment 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 the Averill and Leeds Street Rhodes 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.

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.

On 10 July 2025, Urbis Ltd submitted a Request for SEARs with a Scoping Report which described the site and the proposal as part of the wider HDA Declared precinct (SSD-89441959). Table 5 provides the address and legal description of the land the subject of the proposed Concept SSDA and Stage 1 and Rezoning Application.

Table 5– Site Details (SSD-89441959)

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	

The site area of Stage 3 is 9084 sqm, which exceeds the minimum site area for Site C in the Leeds Street Character Area under Clause 7.19 of the Canada Bay LEP 2013.

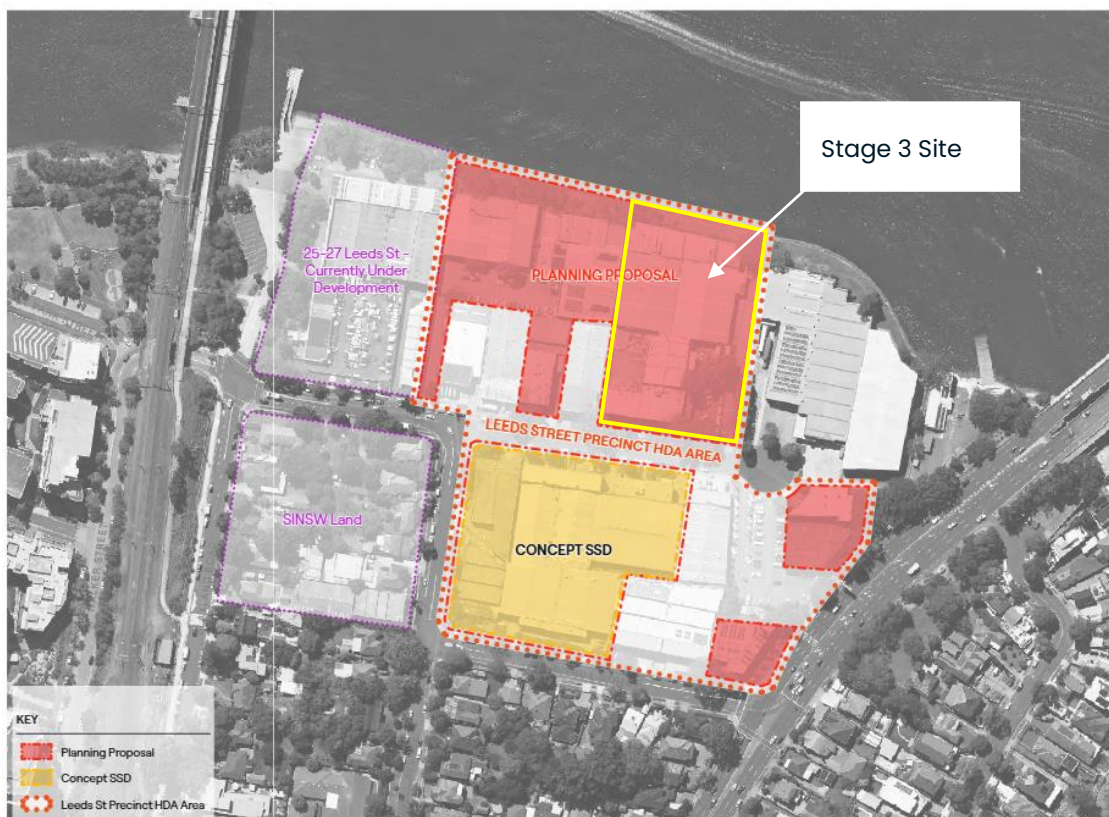
Figure 2 provides a map of site the subject of the proposed Concept SSDA and Stage 1 and Rezoning Application for the Averill and Leeds Street Rhodes Precinct project. Figure 3 provides a map of the HDA Declared SSD Area and proposed Concept SSD and Zoning Application areas.

Figure 1 – Site Aerial Photograph



Source: Scoping Report, Urbis (SSD-89441959) (Stage 3 site outlined with a thin yellow line)

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



Source: Scoping Report, Urbis (SSD-89441959) (Stage 3 site outlined with a thin yellow line)

On 23 July 2025 State Significant Development Declaration Order (No. 11) 2025 in pursuance of Section 4.36(3) of the Environmental Planning and Assessment Act 1979 was made by the Minister for Planning. Schedule 3 of the Ministerial Order No. 11 included an amendment of the State Significant Development Declaration Order 2025 to omit Averill Street and Leeds Street, Rhodes in Schedule 6 and instead insert certain land, as described in the following extract:

Schedule 3 Amendment of State Significant Development Declaration Order 2025

[1] Clause 4(1)(f)

Omit "Averill Street and Leeds Street, Rhodes as identified in Schedule 6".
Instead insert "7-9 Averill Street, 11 Averill Street, 8-10 Leeds Street, 14 Leeds Street, 16 Leeds Street, 17 Leeds Street, 23 Leeds Street, 9-11 Leeds Street, 13 Leeds Street, 1 Averill Street, 7 Leeds Street, 2 Leeds Street, 2A Leeds Street, Rhodes being Lot 12/DP543915, Lot 1/DP236493, Lot 51/DP544063, Lot 241/DP1194187, Lot 240/DP1194187, Lot 25/DP547306, Lot 10/DP239579, Lot 27/DP547201, Lot 1/DP717645, Lot 13/DP239579, Lot 11/DP739491, Lot 28/DP547201, Lot 19/DP239579, Lot 18/DP239579 as legally described as at the date of this Order."

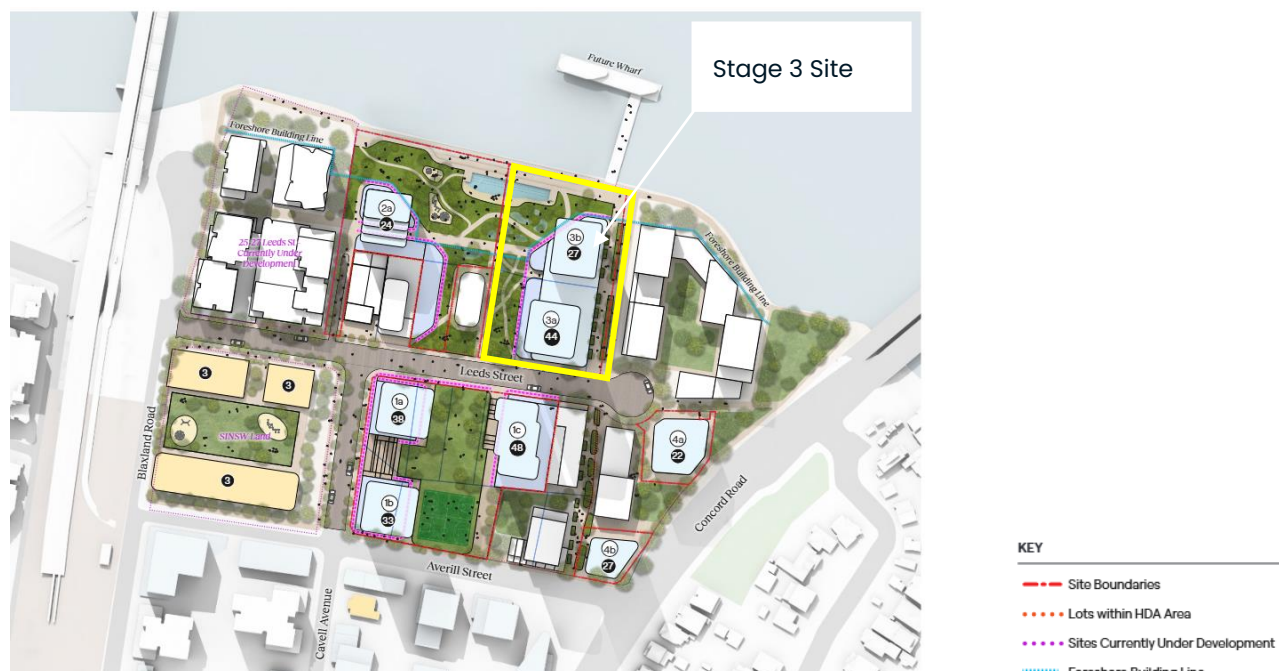
The Amendment of State Significant Development Declaration Order 2025 is consistent with the description of the land subject of the proposed Concept SSDA and Stage 1 and Rezoning Application, in the Scoping Report submitted with the Request for SEARs on 10 July 2025.

State Significant Development SSD-89441959 received project-specific Secretaries Environmental Assessment Requirements (SEARs) on 5 September 2025, for the following development:

Concept DA for 9 mixed use towers consisting of apartment dwellings and retail premises, and Stage 1 Works including demolition works and construction of 3 mixed use towers consisting of apartment dwellings, retail premises, and associated works.

The proposal is for the detailed design and construction of Stage 3 is shown in Figure 2 and described in section 1.3.

Figure 2 – Stage 3 – Averill Street and Leeds Street Precinct Master Plan



Stage 3 site outlined with a thin yellow line

This Scoping Report provides an overview of the proposed development and the relevant planning framework that to enable the issuance of the project-specific SEARs, which will guide the preparation of an Environmental Impact Statement (EIS).

2

Strategic Context

2 Strategic Context

This section identifies the key strategic issues that are likely to be relevant to the justification and evaluation of the project and will be investigated in more detail in the EIS.

Table 6 Consistency of the Project with Relevant Strategic Plans

Strategic Plan	Consistency
National Housing Accord	The National Housing Accord included an initial target to build 1.2 million new well-located homes over 5 years from mid-2024. Leeds Investment Pty Ltd is seeking to bring forward the delivery of an additional 573 homes, which will contribute to meeting the National Housing Accord target for well located homes.
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. Canada Bay LGA has a 5-year target of an additional 5000 dwellings by 2029. The provision of additional 573 homes supports the aims of meeting NSW and Canada Bay housing targets.
Housing Delivery Authority	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). On 23 July 2025 State Significant Development Declaration Order (No. 11) 2025 in pursuance of Section 4.36(3) of the Environmental Planning and Assessment Act 1979 was made by the Minister for Planning. Schedule 3 of the Ministerial Order No. 11 included an amendment of the State Significant Development Declaration Order 2025 to omit Averill Street and Leeds Street, Rhodes in Schedule 6 and instead insert certain land, including the subject site.
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 proposal is consistent with the following objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability: ▪ 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.

Strategic Plan	Consistency
	- This proposal has the potential to deliver 573 dwellings space that would directly contribute to the dwelling supply targets for the district. ▪ Objective 11 – Housing is more diverse and affordable. - The contribution equivalent to 5% of the residential floor space, for affordable housing is a key driver for this project. ▪ 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.
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 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. ▪ Planning Priority E5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport. ▪ Planning Priority E10 – Delivering integrated land use and transport planning in a 30-minute city. 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.
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. 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. ▪ Planning Priority 6 – Provide high quality planning and urban design outcomes for key sites and precincts.
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.

Strategic Plan	Consistency
	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.
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' character area. 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 <i>Environmental Planning and Assessment Regulations 2021</i> ('Regulation'), the EIS will include a statement of consistency against the Rhodes Precinct Place Strategy.
NSW Housing Strategy: Housing 2021	In March 2021, the <i>NSW Housing Strategy: Housing 2021</i> 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

The Site and Surrounds

3 The Site and Surrounds

The site is located at 7-13 Leeds Street, Rhodes, within the City of Canada Bay local government area (**LGA**) and is situated on the peninsula of East Rhodes. The site is currently used for light industry and is the waterfront bound by Parramatta River to the north, industrial land to the east and west and Leeds Street to the south.

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.

Rhodes train station is 800m (10-minute walk) south of the site via Blaxland Road. The key features of the site are summarised in Table 7 below.

Table 7 – Key Features of Site and Locality

Descriptor	Site Details
Land Configuration	The site comprises 3 lots with a total area of approximately 9084 sqm. The site area of Stage 3 is 9084 sqm, which exceeds the minimum site area for Site C in the Leeds Street Character Area under Clause 7.19 of the Canada Bay LEP 2013. The site generally slopes south to north toward the foreshore.
Land Ownership	The land is owned by Leeds Investment Pty Ltd.
Existing Development	The site is currently used for light industrial purposes. Low scale industrial buildings extend along the waterfront.
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: Light industrial warehouses are located to the east. ▪ South: Directly to the South of the site and across Leeds Street, is light industries. ▪ West: Directly adjacent to the site are light industries. 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.
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.
Transport Infrastructure	The site is in proximity to Concord Road which provides a north / south regional connection between the M4 and Victoria Road.

Descriptor	Site Details
	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.
Services	The site is currently serviced and will be assessed further in the EIS.
Acid Sulphate Soils	The site contains Class 2 Acid Sulphate Soils. An Acid Sulphate Management Plan will be prepared to support the SSDA.
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.
Natural Environment	Trees and shrubs are present at the site, generally along the boundary to Leeds Street and along the foreshore of the Paramatta River.
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.

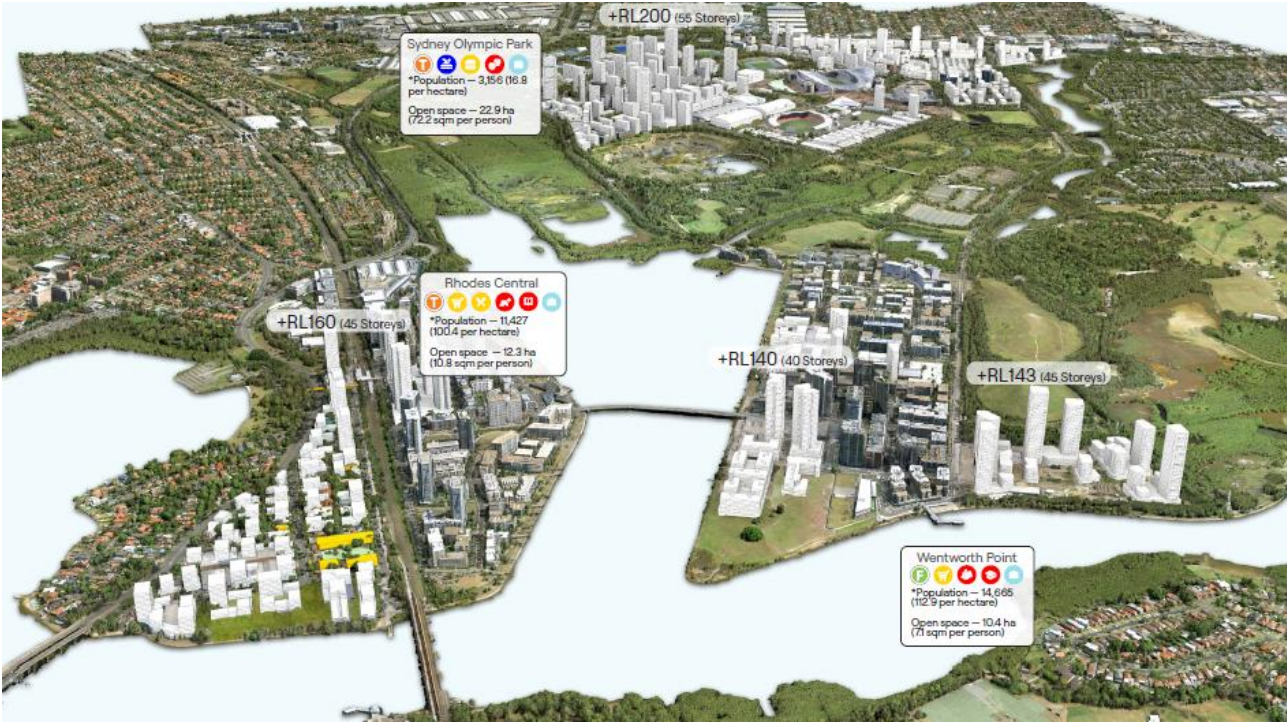
Descriptor	Site Details
Coastal Zone	The site has several mapping overlays, as below: Foreshore and Waterway Area. The site is mapped within the 'foreshore and waterway area' under the Biodiversity and Conservation SEPP. The consent authority must be satisfied that the development will protect the natural 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 3 - Site Map



Stage 3 site outlined with a thin red line

Figure 4 - Local Context Map



Source: SJB

4

The Project

4 The Project

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design, and land use activities.

4.1 Project Overview

The Stage 3 project is a part of a landmark mixed-use development that integrates public open spaces, high-quality housing and essential services into a vibrant mixed-use and residential area with public foreshore access to a revitalised Parramatta River foreshore.

Key features of the Stage 3 development proposal include:

- 573 new dwellings, addressing housing needs.
- 2828 sqm non-residential floor space
- 5438 sqm of public open space for recreation.

4.2 Project Description

Table 8 Project description

Key Element	Proposal
Stage 3 Development Detailed SSDA	▪ Demolition of existing structures and excavation followed by the construction of 2 x mixed-use towers ranging from 27 to 44 storeys, which will accommodate 573 apartments and 2828sqm of non-residential GFA. ▪ Provision of 5438 sqm of landscaped public domain including a foreshore park and pedestrian links. ▪ Approximately 796 car parking spaces. ▪ Vehicle access from Leeds Street
Affordable Housing	▪ Monetary contribution equivalent to 5% of the residential floor space.
Expected Capital Investment Value	▪ >\$60 million

4.3 Relationship to SSD-89441959

The planning approval pathway is for Detailed SSDA for Stage 3. The Detailed SSDA for Stage 3 relies on the Concept SSDA and rezoning application for the Averill and Leeds Street, Precinct project (SSD-89441959).

Figure 5 illustrates the location of the Stage 3 site in the context of SSD-89441959.

Figure 5 – Concurrent Concept SSDA with Detailed SSDA for the first stage and rezoning application



Source: SJB (Stage 3 site outlined with a thin yellow line)

State Significant Development SSD-89441959 seeks to maintain the zoning of the Stage 3 land as MUI Mixed Use. SSD-89441959 seeks to amend the maximum height of building and FSR development standards for the Stage 3 site, as follows:

Building Height	The site is subject to several different maximum height of building standards as defined by the CB LEP 2013. The proposed height of buildings (HOB) are outlined in the table below:		
	Address	Current HOB standard	Proposed HOB standard
	7 Leeds Street	8m RL	96m
	9-11 Leeds Street	34.1m & 55.8m RL	150m
	13 Leeds Street	34.1m RL	150m
Floor Space Ratio	The site is subject to several different maximum FSR bands as defined by the CB LEP 2013. The proposed FSR standards are outlined in the table below:		
	Address	Current FSR standard	Proposed FSR standard
	7 Leeds Street	1.7:1	4.3
	9-11 Leeds Street	1.7:1	4.3
	13 Leeds Street	1.7:1	4.3

4.4 Detailed Development Description

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

4.4.1 Detailed SSDA Stage 3 Proposal

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

- Demolition of existing structures, vegetation removal and excavation.
- Construction of two mixed-use towers ranging from 27 to 44 storeys.
- Accommodation of 573 apartments.
- Provision of 2828sqm of non-residential GFA.
- Creation of 5438 sqm of public domain with associated landscaping.
- Approximately 796 car parking spaces.

5

Statutory Context

5 Statutory Context

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

5.1 Statutory Requirements

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

Table 9 – Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	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> On 23 July 2025 State Significant Development Declaration Order (No. 11) 2025 in pursuance of Section 4.36(3) of the Environmental Planning and Assessment Act 1979 was made by the Minister for Planning. Schedule 3 of the Ministerial Order No. 11 included an amendment of the State Significant Development Declaration Order 2025 to omit Averill Street and Leeds Street, Rhodes in Schedule 6 and instead insert certain land, including the subject site.
Permissibility	The site is zoned MUI (Mixed Use) in accordance with the CB LEP 2013. 'Shop top housing' is permitted with development consent within the MUI (Mixed Use) zone.

5.2 Pre-Conditions

Table 10 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 10 – 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	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).

Statutory Reference	Pre-condition	Relevance
	remediate the land to ensure it is suitable for its intended use.	
<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.
<i>Canada Bay LEP 2013</i>	Zoning MUI Mixed Use	The proposed residential and non-residential land uses are permitted with consent in the MUI Mixed Use Zone.
	Clause 4.3 Maximum Height of Buildings. Multiple building heights apply to different parts of the site	State Significant Development SSD-89441959 seeks to increase the maximum permitted heights of buildings for the Stage 3 site
	Clause 4.4 Floor Space Ratio. The maximum FSR for the site prescribed by the LEP is 1.7:1. Inclusive of the 5% bonus FSR provided under Clause 7.11 (Leeds Street Precincts), the site has a permissible maximum FSR of 1.785:1.	State Significant Development SSD-89441959 seeks to increase the maximum permitted FSR for the Stage 3 site.
	Clause 5.10 Heritage conservation	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.

Statutory Reference	Pre-condition	Relevance
		- Ryde Bridge street trees (Local) Concord Road (Ryde Bridge approach) 1116. 14 Cavell Avenue, Rhodes (Local) 177. - Cavell Avenue Street Trees (Local) 179. A Heritage Impact Assessment will form part of the SSDA.
	Clause 5.21 Flood planning	A flood assessment will be undertaken for the EIS/SSDA.
	Clause 6.1 Acid sulphate soils	The site is mapped as comprising Class 2 acid sulphate soil. An ASSMP will be prepared for the EIS/SSDA.
	Clause 6.2 Earthworks	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.
	Clause 6.5 Active Street frontages	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. State Significant Development SSD-89441959 seeks to amend the Active Frontage Map to reflect the proposal will be included with the Concurrent LEP Amendment.

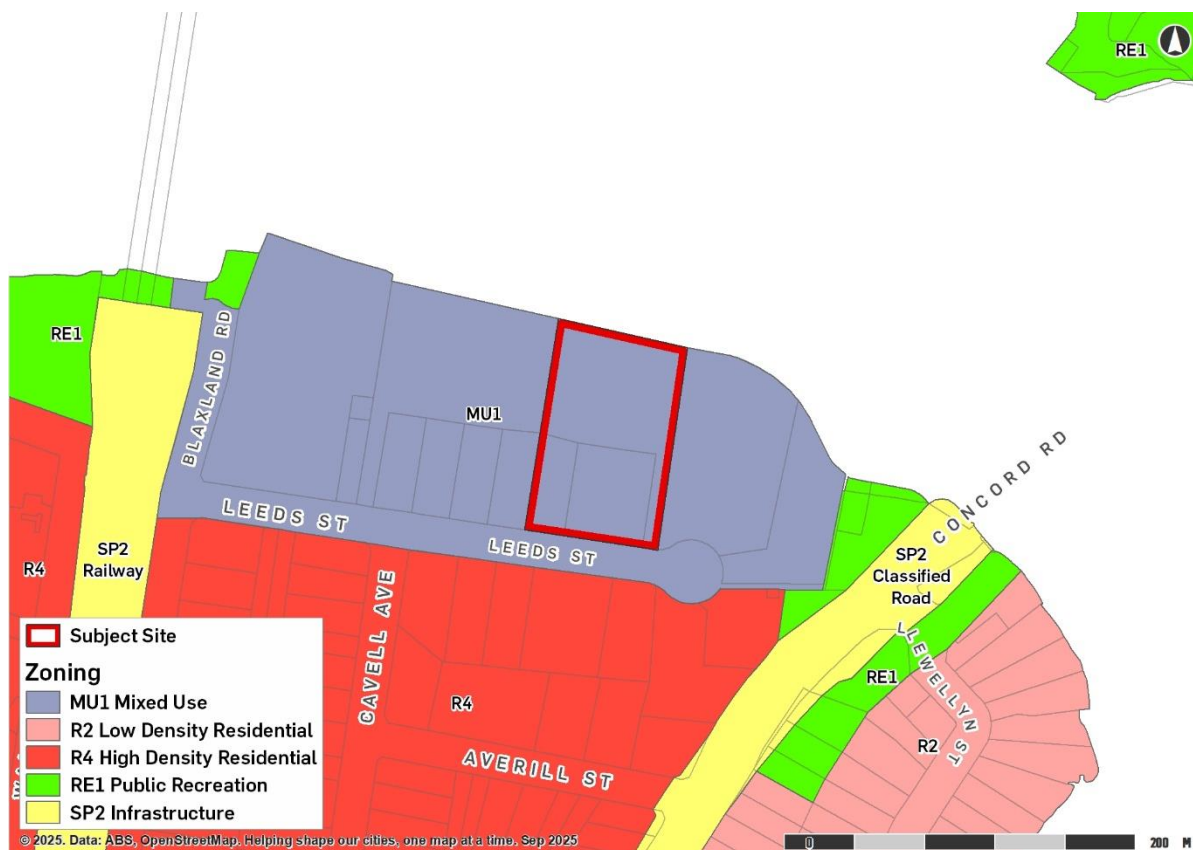
Statutory Reference	Pre-condition	Relevance
	Clause 6.10 Public utility infrastructure	The site is within an area that has established infrastructure and services. Further information about the anticipated supply of utility services will be provided in the EIS.
	Clause 6.4 Limited development on foreshore 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.	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 (SSD-89441959), with an overall increase in the foreshore open space. 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 6.11 Mix of dwelling sizes in residential flat buildings and mixed use development	The dwelling mix will be confirmed at the SSDA stage and form part of the EIS.
	Clause 6.12 Affordable housing	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 equivalent monetary contribution.

Statutory Reference	Pre-condition	Relevance
	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 7.3 Overshadowing of public places in Rhodes Precinct 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 ▪ McIlwaine Park Secondary Zone – 8:30am-12:30pm ▪ George V Park – 8:30am-12:30pm	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 Park – 8:30am-12:30pm. 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.

Statutory Reference	Pre-condition	Relevance
	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. (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.	State Significant Development SSD-89441959 seeks to amend the minimum building separation distance controls for the Stage 3 site.
	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.	Proposed podiums do not exceed 16m.
	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. Refer to Section 7 for further explanation the dwelling cap.
	Clause 7.8 Maximum number of car parking spaces for uses of land in Rhodes Precinct	Car parking for the development will comply with the maximum LEP car parking controls.
	Clause 7.10 Site area of proposed development in Rhodes Precinct includes dedicated land	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.
	Clause 7.11 Additional floor space for certain BASIX affected buildings in Rhodes Precinct	The proposal will not be relying on the BASIX FSR bonus.

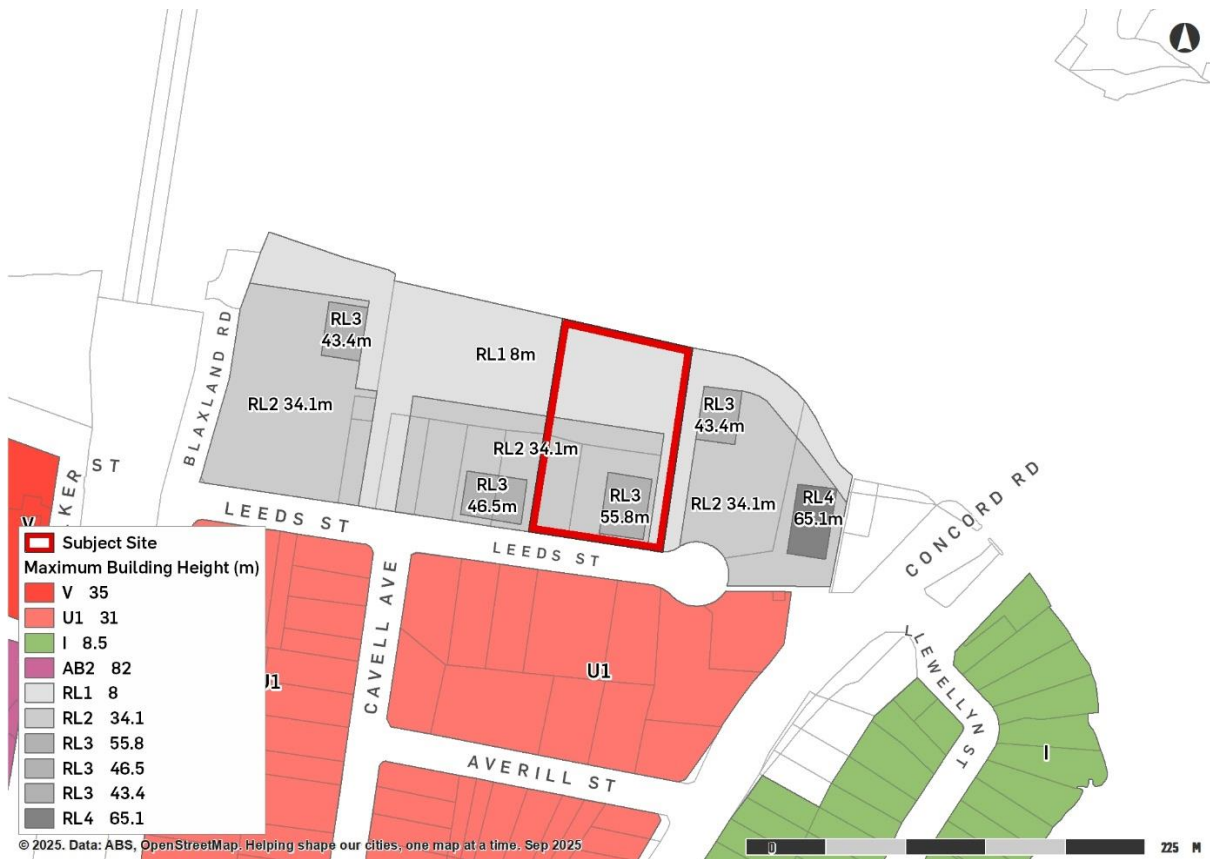
Statutory Reference	Pre-condition	Relevance
	Clause 7.19 of the Canada Bay LEP has a requirement for the minimum site areas in the Leeds Street Character Area. The Stage 3 site is referred to as Site C, which has a minimum site area of 9000 sqm.	The site area of Stage 3 is 9084 sqm, which exceeds the minimum site area for Site C in the Leeds Street Character Area under Clause 7.19 of the Canada Bay LEP 2013.

Figure 6 – Zoning Map



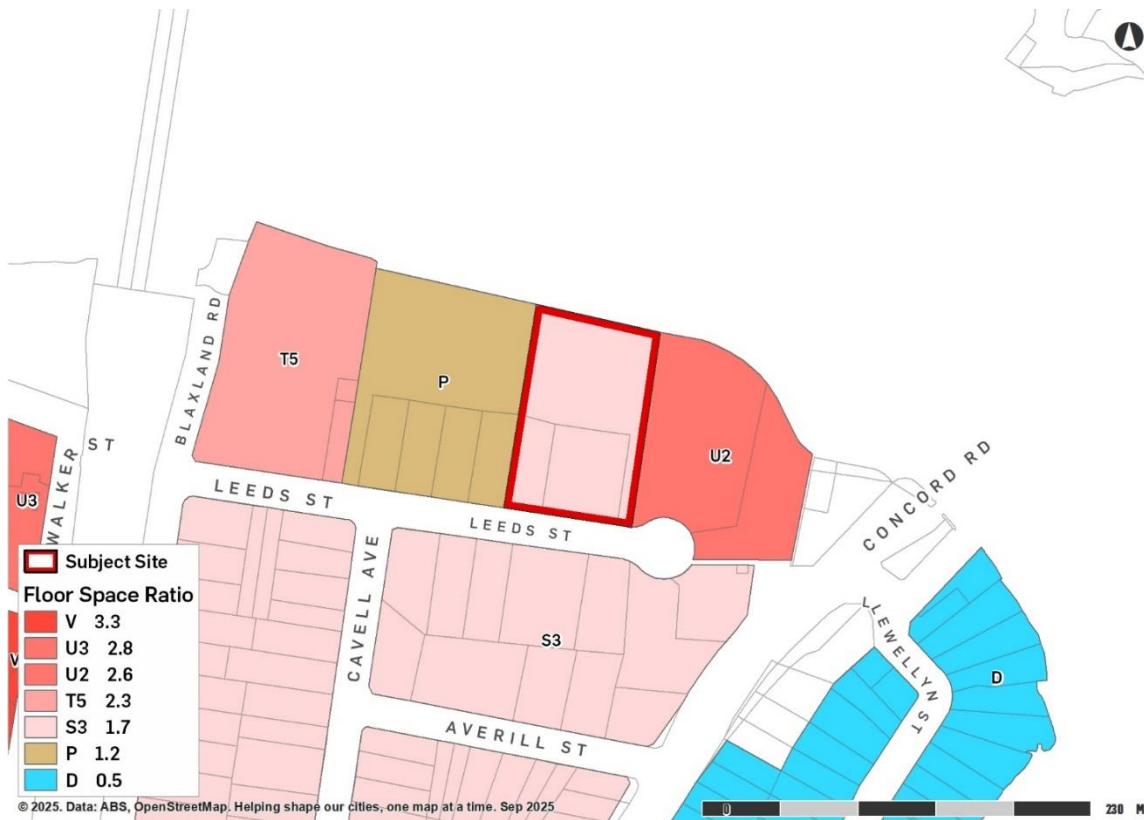
Source: Urbis

Figure 7 – Height of Building Map (Stage 3 site outlined with a thin red line)



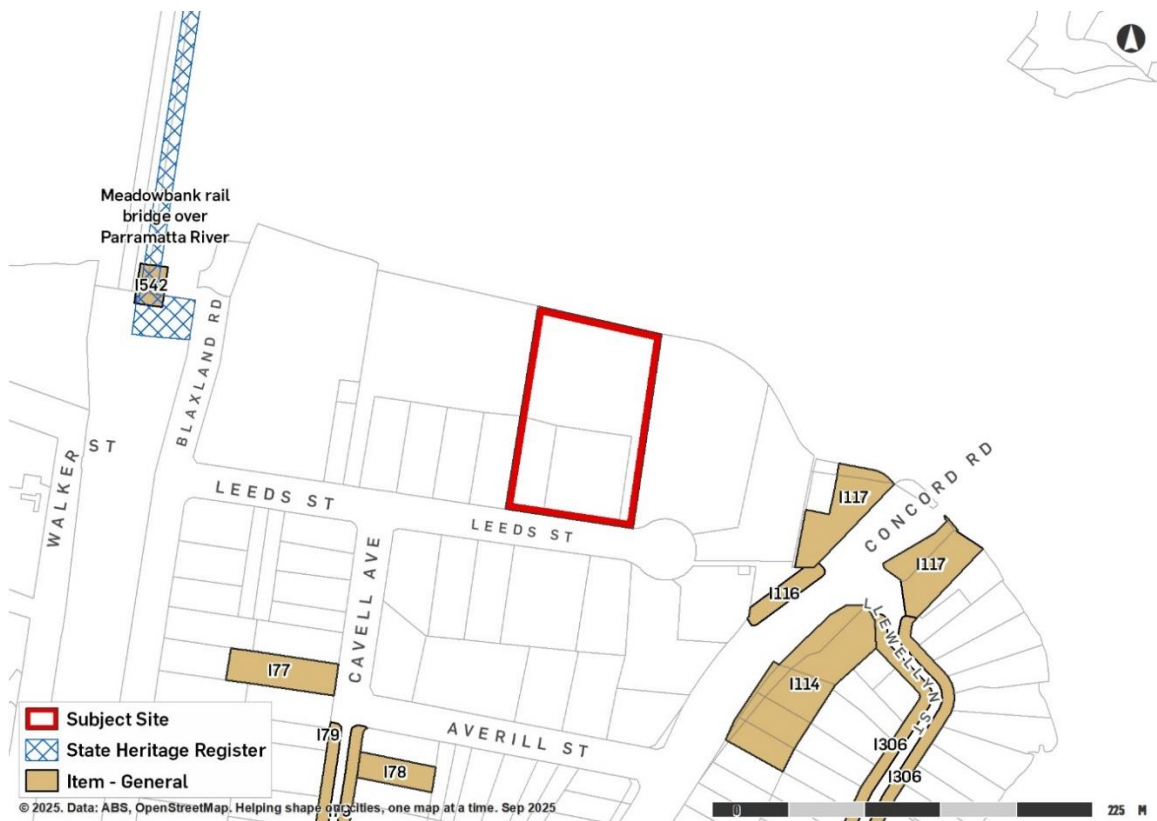
Source: Urbis (Stage 3 site outlined with a thin red line)

Figure 8 – FSR Map



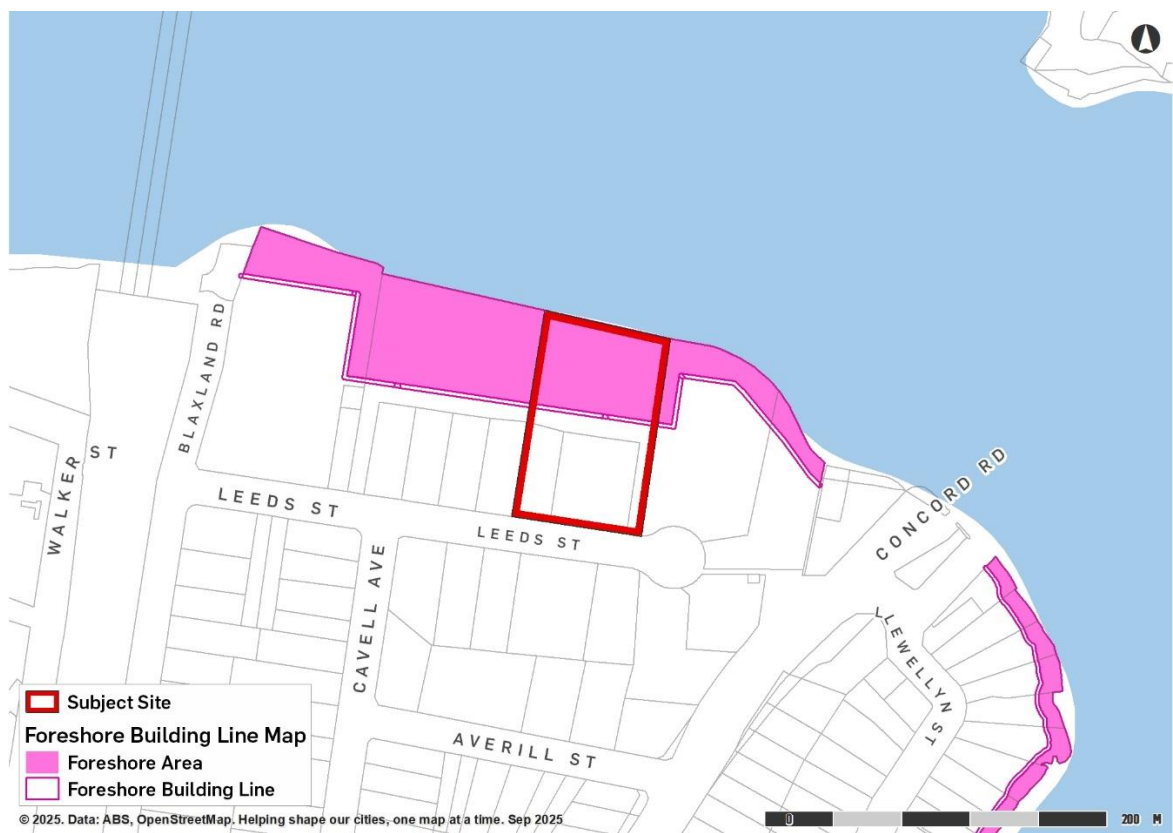
Source: Urbis (Stage 3 site outlined with a thin red line)

Figure 9 – Heritage Map



Source: Urbis (Stage 3 site outlined with a thin red line)

Figure 10 – Foreshore Building Line Map



Source: Urbis (Stage 3 site outlined with a thin red line)

5.3 Mandatory Considerations

Table 11 outlines the relevant pre-conditions to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 11 – 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
Canada Bay LEP 2013	Objectives and land uses for land in Zone MUI Mixed Use and Zone R4 High Density Residential

Statutory Reference	Mandatory Consideration
	• 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.
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.

Statutory Reference	Mandatory Consideration																												
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																							
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.

6

Community Engagement

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 associated with SSD-89441959.

The Applicant is proceeding with the formal consultation process as part of preparing the Environmental Impact Statement (EIS) and concurrent rezoning application for SSD-89441959, 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 for SSD-89441959, 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

7 Proposed Assessment of Issues

This section identifies the key impacts which will be further investigated and assessed within the EIS for the detailed Stage 3 works, including the proposed approach to assessing each of these matters. It is noted that a rezoning application is being prepared for the Averill and Leeds Street Rhodes Precinct project (SSD-89441959), which is to address the strategic land use and built form changes. This section identifies the detailed assessment matters that are anticipated for the proposed Stage 3 works. It also 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 provides a 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.

7.1.1 Compliance with Strategic and Statutory Plans

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.

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.

Transport for NSW is undertaking a review of the dwelling cap for Rhodes Precinct, in parallel with the assessment of SSD-89441959.

The EIS/SSD and rezoning application will be supported by a Traffic and Transport Impact Assessment prepared by a qualified transport consultant that addresses the SEARs and Rezoning Study requirements for SSD-89441959. A suitable Traffic and Transport Impact Assessment report will be prepared for the detailed SSD for the proposed Stage 3 works so 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.

7.1.3 Built Form, Urban Design and Public Domain

Concept Architectural Plans submitted with SSD-89441959 provide a preliminary indication of the proposed building footprints and envelopes and open spaces that form this SSDA with concurrent rezoning. The Stage 3

proposal is an enhanced built form outcome for the site and will comprise building heights ranging from 27 to 44 storeys, which is one of the stages of the Concept SSD and rezoning application.

The CB LEP requires 'active' frontages. 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. The final architectural package will also detail the rationale for the siting and layout of the proposed development, including loading and access arrangements.

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 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.

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

Noise and Vibration

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.

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.

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 Excellence

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 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 3 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.

7.1.6 Hazards and Risks

Land Contamination

A Detailed Site Investigation is to be prepared for the SSDA and rezoning application (SSD-89441959). 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 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.

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.

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 proposal. 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.

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. SSD-89441959 will be accompanied by a social impact assessment and an economic impact assessment. It is not anticipated to need to replicate this strategic work, as part of the Detailed Stage 3 SSDA.

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 locations 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 (SSD-89441959). The assessment is to include recommendations for the relevant finished floor levels for ground floor retail tenancies / residential dwellings and basement carpark entries, and these recommended mitigation measures will be implemented in the Stage 3 works.

7.1.2 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 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 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'.

7.2.2 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.

8

Conclusion

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 Detailed SSDA for the mixed-use redevelopment of the Stage 3 site. The Detailed Stage 3 SSD replies on the Concept SSDA and rezoning application for the Averill and Leeds Street Rhodes Precinct (SSD-89441959). It has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, relationship to SSD-89441959, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project.

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

Disclaimer

This report is dated October 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.



**Shaping cities
and communities
for a better future.**

urbis.com.au