



19 August 2025

Our reference: 225476

Ryan White

Department of Planning, Housing and Infrastructure
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RE: Sydney Water input to SEARs for SSD-89441959 at 2-23 Leeds Street and 1-11 Averill Street, Rhodes (HDA Pathway)

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for the development proposal at 2-23 Leeds Street and 1-11 Averill Street, Rhodes, proposed by Billbergia. The SSDA will seek consent for a Concept Proposal and detailed Stage 1 works as follows:

- Concept Proposal
 - Delivery of nine mixed-use towers containing up to **2,020** dwellings, with a residential GFA of 213,087m², and non-residential GFA of 15,020m².
 - 16,325m² of public domain space.
 - A foreshore park to be dedicate to Canada Bay Council and upgrades to the foreshore riverside boundary.
 - Private sporting fields
- Detailed Stage 1 works
 - Demolition of existing structures and site works
 - Construction of three mixed-use towers of between 33-48 storeys, to accommodate **834 dwellings**.
 - 9,350m² of non-residential GFA
 - 5,600m² of public domain and landscaping
 - Road, civil, stormwater and earthworks.

The proposed development has been designated a State Significant Development through the Housing Delivery Authority pipeline. A Planning Proposal to amend the Canada Bay LEP 2013 will be progressed concurrently.

Sydney Water requests that the Department of Planning, Housing and Infrastructure (the Department) include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (where required) services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. To do this, it is **required** that the proponent register a direct **Feasibility** enquiry with Sydney Water as soon as possible via an approved [Water Servicing Coordinator](#) (WSC) to ascertain servicing needs and to ensure the proposed development is considered in any potential planning, land requirements, existing or future easements that we might be undertaking or investigating.

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3. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.
4. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.
5. Strict requirements for the protection of Sydney Water's stormwater assets may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater

Integrated Water Cycle Management (IWCM)

6. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.
7. It is **required** that the proponent engages directly with Sydney Water via the Feasibility process and discuss IWCM opportunities.

Growth information

Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require **anticipated ultimate and annual growth data** for this development as outlined in the enclosed Growth Data Form.

A **Feasibility application** will enable a comprehensive servicing review ensuring the proposed development is considered in any potential planning that we might be undertaking. Failure to provide this information may impede proper planning requirements for the proposed development and for the broader area. The completed growth form should be submitted by the proponent to Sydney Water as part of the Feasibility application via a Water Servicing Coordinator (WSC), citing this referral response and our reference number.

Next steps

- Given the scale and complexity of the proposed development, further investigations may be required to determine the servicing requirements for this site. It is required that a Water Servicing Coordinator is engaged as soon as possible, and a **Feasibility application** is submitted with Sydney Water **prior to the preparation of the EIS**.
- The proponent should complete and return the enclosed Growth Data Form as part of their Feasibility application submission. The Growth Data Form should be updated promptly with Sydney Water in case of changes.
- The Department is advised to forward the enclosed *Sydney Water Development Application Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.

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If the proponent has any questions, they should contact their Sydney Water case manager once a Feasibility is lodged. Should the Department require further information, please contact Fiona Feng from the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

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Growth and Development
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Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- Sydney Water Development Application Information Sheet (for proponent)
- Sydney Water Growth Data Form