

Our ref: Leeds Street & Averill Street Mixed Use (SSD-89441959)

Mr Max Gran
Development Manager
LEEDS INVESTMENT PTY LTD
23
ANGAS STREET
MEADOWBANK 2114

5 September 2025

Subject: Planning Secretary's Environmental Assessment Requirements

Dear Mr Gran

Please find attached a copy of the Planning Secretary's environmental assessment requirements (SEARs) for the Leeds Street & Averill Street Mixed Use (SSD-89441959).

The SEARs have been prepared in consultation with relevant public authorities, based on the information you have provided. A copy of the advice from the public authorities is attached for your information.

Where relevant, the Planning Secretary may modify the SEARs to ensure the environmental assessment of the project covers all relevant matters and is consistent with contemporary assessment practice.

Your SEARs will expire two years from the date of issue (or the date they were last modified) unless the Planning Secretary has granted an extension. If you would like to seek an extension, you should contact the department at least three months prior to the expiry date.

If your application is not submitted within two years (or by the agreed extension date), you will need to make a new application for SEARs to progress your project.

Additional assessment requirements

The Department has identified the following assessment matters to be addressed in consideration of the attached SEARs:

1. For the Department to consider the transport infrastructure required to service the development, with regard to the dwelling cap in Clause 7.7 of the Canada Bay LEP 2013 (CBLEP), the rezoning report and environmental impact statement must address all traffic and transport infrastructure assessment requirements contained in the DPHI – Traffic and Transport Response in Appendix B.

2. The environmental impact statement must include an assessment of consistency with the Rhodes Place Strategy 2021 (RPS), as required by Clause 35 of the Environmental Planning and Assessment Regulation 2021.
3. To ensure orderly development on the northern side of Leeds Street, which is a prominent foreshore location described as the Leeds Street Character Area in the RPS and Canada Bay Local Environmental Plan 2013 (CBLEP), the Department recommends that you consider excluding development on this area of the site until compliance with the minimum site area requirements in Clause 7.19 of the CBLEP can be achieved.
4. The proposed scale and fragmented nature of the development requires further justification with regard to impacts on the future development potential, and site isolation of the surrounding land on Leeds and Averill Streets. The proposal must demonstrate that it will not unreasonably inhibit the development potential of other sites in the vicinity (as envisaged by the RPS), and that the issue of site isolation has been addressed, with evidence, in consistency with the planning principles contained in *Karavellas v Sutherland Shire Council [2004] NSWLEC 251*.
5. 1 Averill Street, Rhodes is partially affected by an *SP2 Infrastructure* land use zone due to its proximity to Concord Road, a classified road adjoining the site to the east. Further clarification is required as to whether the proposal will be sited outside the SP2 zone (so as to avoid prohibition) or if changes to this zone will be addressed in the concurrent rezoning.
6. A visual impact analysis and assessment must be provided including the proposed buildings compared to the existing conditions and anticipated building envelopes under the existing planning controls. The analysis must include views of the site from key vantage points in the vicinity, including but not limited to:
 - a. Southern and northern end of John Whitton Bridge;
 - b. Southern and northern end of Ryde Bridge
 - c. Meadowbank Ferry Wharf
 - d. Ryde Wharf Reserve;
 - e. Settlers Park;
 - f. Various vantage points from Rhodes West;
7. The concurrent rezoning for additional non-residential floor space must be supported by an economic and retail analysis.

8. The Department notes that 2A Averill Street, Rhodes is nominated as a parcel of land subject to the development. 2A Averill Street may be currently owned by NSW Crown Land. If so, consultation with NSW Crown Land and owners consent for this parcel of land will need to be included with the lodgement of a development application.
9. Respond to all matters contained in the agency responses (refer to the appendices in Attachment 1).

Concurrent Planning Proposal

You have indicated in your application that a concurrent planning proposal will be submitted to the Department for assessment. The Department has enclosed the requirements for the preparation of the planning proposal.

Preparing your EIS

Your environmental impact statement (EIS) must be prepared having regard to the department's *State Significant Development Guidelines* – including the *Preparing an Environmental Impact Statement Guideline*. All relevant guides for State significant projects that are referenced in the SEARs are available at <https://www.planning.nsw.gov.au/policy-and-legislation/planning-reforms/rapid-assessment-framework/improving-assessment-guidance>.

During the preparation of your EIS, you are required to consult with various parties, including the department and relevant agencies, in accordance with *the Undertaking Engagement Guidelines for State Significant Projects*. For more information, please visit the [Prepare EIS page](#) on the NSW planning portal. Agency contact details can be found at <https://www.planningportal.nsw.gov.au/major-projects/assessment/guide-agency-directory>.

You will need a Registered Environmental Assessment Practitioner (REAP) to declare that your EIS meets certain standards in relation to its completeness, accuracy, quality and clarity before it is submitted to the department, as per Division 5 of Part 8 of the Environmental Planning and Assessment Regulation 2021. A pro forma declaration can be found in [Appendix B of the *Preparing an Environmental Impact Statement Guideline*](#).

Lodging your development application (DA)

Once you submit your EIS, we will check it for completeness to confirm it addresses the requirements in Part 8 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). We will also notify you of the DA fee for your project.

Please note that your DA is not taken to be lodged until the DA fee has been paid.

To minimise delays, please contact the department at least two weeks before you submit your EIS to confirm fee determination information and payment arrangements. This will give us sufficient time to ensure your application fee can be determined quickly.

Information needed to determine the DA fee

Your application will need to be accompanied by an Estimated Development Cost (EDC) Report supporting the estimated development cost for your project. You must ensure that the information in the report is consistent with the information provided in your DA form.

Once you submit your EDC Report, we will check it for completeness against the requirements of the EP&A Regulation and the relevant Planning Circular.

If your project involves marinas, extractive industries or any subdivision of land, you must also ensure that your report includes a breakdown of estimated costs for any other component of your project.

Public exhibition requirements

When you contact us regarding the applicable DA fee, we will also advise whether hard and/or electronic copies of the EIS will be required for public exhibition.

Matters of National Environmental Significance

Any development likely to have a significant impact on matters of National Environmental Significance will require approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to approvals required under NSW legislation.

It is your responsibility to contact the Australian Government Department of Climate Change, Energy, the Environment and Water to determine if you need approval under the EPBC Act (<https://www.dcceew.gov.au/> or 6274 1111).

If you have any questions, please contact Suzannah Byers on 02 8289 6825 or via email at suzannah.byers@planning.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to be "K T" followed by a horizontal line.

Keiran Thomas

Director Housing Delivery Assessments

as delegate for the Planning Secretary