

21 October 2020

Malcolm McDonald
Executive Director, Infrastructure, Housing and Employment
Department of Planning and Environment
GPO BOX 39
Sydney NSW 2001

By email: malcolm.mcdonald@planning.nsw.gov.au
cc: brendan.metcalf@planning.nsw.gov.au

Dear Malcolm,

City of Canada Bay Submission to the draft Rhodes Precinct Place Strategy

The City of Canada Bay commends the Department of Planning, Industry and Environment (DPIE) on the release of the draft Rhodes Precinct Place Strategy (Place Strategy).

Council thanks the DPIE for extending the exhibition period, so as to enable this submission to be considered at a Council meeting.

The Place Strategy represents a significant improvement over the previously exhibited Precinct Plan for Rhodes. The evolution from the previous Precinct Plan that contemplated developer led master plans to the new Place Strategy, which now comprises a government led planning framework is supported by the City of Canada Bay.

Given the significant density proposed, Council seeks assurance from DPIE that the key planning and urban design benefits outlined in the draft planning package will not be reduced or lessened as the draft Place Strategy moves forward to finalisation.

The attached submission summarises Council's feedback and provides comments and recommendations to the DPIE for consideration.

Should you require further information in relation to this submission, please contact Tina Kao, Coordinator Strategic Planning on 02 9911 6412 or tina.kao@canadabay.nsw.gov.au.

Yours sincerely,



Paul Dewar
A/Director, Community and Environmental Planning

City of Canada Bay Council submission to draft Rhodes Precinct Place Strategy

Executive Summary

Council has prepared this submission to the Department of Planning, Industry and Environment in response to the exhibition of the draft Rhodes Precinct Place Strategy (Place Strategy).

The Place Strategy includes a number of positive elements in relation to; the delivery of a new school, planning for new open space adjacent to the foreshore, introduction of Design Excellence requirements, delivery of affordable housing through SEPP 70 and a renewed commitment to the delivery of a Ferry Wharf.

We have considered the Place Strategy, Explanation of Intended Effects (EIE) and the Urban Design Report (UDR) placed on exhibition. It is requested that the matters raised in this submission be considered by DPIE for inclusion in the plan and any subsequent satisfactory arrangements and business cases to Government.

The submission is organised into the following themes:

1. Introduction
2. Affordable Housing
3. Density & Design Excellence
4. Visual Impact – Parramatta River
5. Resilient Development
6. Traffic & Transport
7. Canopy Cover & Green View Index
8. Uhrs Point Launch facility
9. Community (Social) Infrastructure
10. New School
11. Council owned land

Council thanks DPIE for the consultative approach taken to include CCBC staff in progressing the Place Strategy. This has resulted in CCBC having a better understanding of the intent set out in the exhibited documents.

Council appreciates the opportunities DPIE has provided to CCBC as an important stakeholder in the planning process. It is critical that CCBC continues to be engaged as part of any further work and/or the finalisation of the precinct plan. Council looks forward to a continued working relationship with the DPIE to ensure that issues raised by the Council and the community are addressed in the plan making process and to deliver the identified public benefits identified within the exhibited Place Strategy.

Introduction

The Rhodes Peninsula is wholly within the City of Canada Bay Local Government Area, with Council being the Local Planning Authority. Council nominated, and the Department of Planning identified Rhodes as a Planned Precinct in 2015 to achieve objectives in relation to sustainability, the encouragement of active transport, the delivery of affordable housing, achieving density with a human scale, providing enhanced waterfront access and providing a range of high quality public spaces.

The Greater Sydney Region and Eastern City District Plan, released in March 2018, recognise the importance of the peninsula, with it being nominated as a Strategic Centre and a Collaboration Area – focusing on fostering sustainable water and energy infrastructure.

The City of Canada Bay (CCBC) commends the Department of Planning, Industry and Environment (DPIE) on the release of the draft Rhodes Precinct Place Strategy (Place Strategy). In particular, CCBC strongly supports the advancement of the 2018 structure plan into a masterplan. The 'planning by design' approach pursued by DPIE has provided an improved level of transparency for the community.

Council's submission on the Revised Draft is provided in detail under the following themes reflecting key considerations for the DPIE as the Place Strategy moves forward to finalisation.

Affordable Housing

The EIE sets out an affordable housing contribution under the *State Environmental Planning Policy No.70 Affordable Housing (Revised Schemes)* for all development in Rhodes Planned Precinct. For land east of Rhodes railway line, the contribution rate is 5% of total gross floor area (GFA), whilst in Rhodes Gateway West, the rate is 5% of total GFA above the allowable GFA under the Canada Bay LEP, except for the sites at 4 Mary Street and 1-9 Marquet Street where 3.5% is to apply.

Council has worked cooperatively with DPIE to establish a transparent and robust affordable housing program for implementation in Rhodes over many years.

CCBC is now included within State Environmental Planning Policy No. 70 (SEPP 70) and Council has adopted an Affordable Housing Policy, an Affordable Housing Contribution Plan and has prepared a Local Environmental Plan to give effect to these policies. Only through the accepted state and local government planning framework will the principles of SEPP 70 be capable of being implemented in a consistent and equitable manner.

Given the extensive strategic and statutory framework in place, the delivery of Affordable Housing should be a mandatory outcome in the Rhodes Planned Precinct.

Affordable housing should be provided in accordance with the accepted statutory mechanism in NSW, i.e. in accordance with SEPP 70, LEP provisions and an Affordable Housing Contribution Scheme that is prepared in a manner consistent with the Guidelines released by DPIE.

Specifically, Council is of the view that affordable housing should be provided in perpetuity, be owned by Council and be managed by Council or Council's nominated Community Housing Provider. It is Council's position that this outcome is non-negotiable and individual

developers should not be permitted to negotiate alternative arrangements for affordable housing that undermine or are directly inconsistent with the core principles of SEPP 70.

Density & Design Excellence

Density

The Place Strategy includes an indicative dwelling yield of 4,260 dwellings. Should the Place Strategy be implemented as proposed, the ultimate dwelling density within the Rhodes Precinct boundary will be higher than any existing suburb in Australia and higher than any SA2 (a comparable statistical area) in inner Melbourne or inner Sydney. The density proposed equates to 202 dwellings per hectare when the existing approved development in Station Gateway West is taken into consideration. This amount is almost double the highest density in Sydney (Potts Point/Woolloomooloo), where the maximum density is between 108-110 dwellings per hectare.

Many of the issues raised in this submission relate to the impacts arising as a consequence of the density proposed. The capacity of the road and transport network, open space requirements for the school, pressures on community (social) infrastructure, overshadowing and other impacts can all be addressed through a reduction in overall dwelling yield.

The Rhodes planning process commenced in 2016 to review the land use opportunities in Rhodes east (between the railway line and Concord Road). It was never required nor contemplated that land to the west of the railway, would be the subject of additional density given the recently adopted Council Master Plan for the Station Precinct. Where density is to be staged due to transport and traffic network constraints and other planning considerations, development in Rhodes West should not be prioritised at the expense of a coordinated development in Rhodes East.

DPIE to consider an overall reduction in the number of dwellings proposed for the Rhodes Peninsula (Rhodes West) following public exhibition of the Place Strategy.

Wind Mitigation

Wind tunnels and high speed wind at ground level have been an ongoing issue for residents and visitors to Rhodes. A number of public spaces are already impacted by wind effects created through the clustering of towers.

Impacts of wind need to be resolved and addressed at the plan making stage when building heights and envelopes are locked in. The resolution of wind relates impacts cannot be left to justification at development applications stage as Council has limited ability to respond to wind relates impacts through architectural treatments.

It is requested that wind analysis be undertaken prior to the finalisation of the Rhodes Place Strategy. Any such analysis must be undertaken done by an independent expert unrelated to any landowner. This is to ensure outcomes of wind impact testing are robust and impartial to all stakeholders. Where analysis reveals there would be significant new or additional wind related impacts, building heights and envelopes need to be further refined before progressing the draft Place Strategy.

Design Excellence Requirements

In circumstances where this high level of density continues to be pursued, the plan must include the minimum design excellence requirements as set out in the exhibited Urban Design Report and the Explanation of Intended Effect. These include, but are not limited to maximum floor plate size, minimum tower separation distances and retention of solar access to public squares and green open spaces.

Assurance is also sought from DPIE that no relaxation or reduction in design quality outcomes will be considered that will enable any further increases in density or dwelling yield than contemplated by the draft Place Strategy.

CCBC requests that no reduction in design quality requirements be contemplated that would result in any further increase in density or dwelling yield. This includes any increase to the exhibited building footprints, floor space ratios or building heights and any reduction to the exhibited tower separation or solar access requirements.

CCBC requests that the exhibited design quality requirements be retained as development standards or Local Environmental Plan provisions in any planning instrument that moves forward to finalisation.

Visual Impact – Parramatta River

The Leeds Street precinct is a strategic foreshore site listed in SEPP - Sydney Harbour Catchment. It is strategic, not because of its ability to accommodate density but rather due to its sensitive location on the foreshore of the Parramatta River.

With the exception of the CBD, both State and local government have consistently sought to minimise tall buildings immediately adjacent to the foreshore on the peninsulas of Sydney Harbour and the Parramatta River. It is a commonly accepted planning principle/objective to minimise the visual impact of development in these locations. This is reflected in the Eastern City District Plan that set out to enhance and protect views of scenic and cultural landscapes from the public realm and Council's LSPS which seeks to "Ensure that land use change in foreshore and peninsula localities does not have a significant adverse impact upon views to and from Parramatta River and Sydney Harbour, from within and outside the LGA".

Concern is specifically raised with regard to the scale of the two towers proposed adjacent to the foreshore on the eastern edge of the Leeds Street precinct. The height of the buildings, combined with the peninsula location and proximity to the foreshore creates an outcome where the scale of the two towers is too high.

CCBC requests that the two towers adjacent to the foreshore at the eastern edge of the Leeds Street precinct be reduced in height and scale.

Resilient Development

The EIE proposes a bonus gross floor space area of 5% for land to the east of the railway line where developments are able to achieve a BASIX target of 40% for Energy (increased from 25%) and 60% for Water (increased from 40%).

Initiatives such as increased BASIX targets, the installation of separated reticulation systems for potable and non-potable water, as well as the requirement for solar energy distribution networks are all outcomes that achieve the objectives of both State and Local Government as outlined in the Eastern City District Plan and the CCBC Local Strategic Planning Statement.

CCBC strongly supports the inclusion of precinct-wide sustainability outcomes in localities such as Rhodes where broad scale renewal is proposed. As the floor space incentive proposed exceeds the cost for developers to deliver the identified sustainability outcomes, it is requested that these requirements be retained in any amendment to the Canada Bay Local Environmental Plan 2013 arising from the finalisation of the Place Strategy.

Traffic and Transport

A key constraint to development in Rhodes is the limitation of existing transport networks. In particular, congestion of the Concord Road/Homebush Bay Drive intersection, the intersection to the north of the Ryde Bridge and the capacity of the T1 Northern Train line are all constraints that need to be understood to determine whether the projected dwelling growth can be supported.

Evidence-based planning is essential to identify infrastructure needs to service planned growth and to ensure effective outcomes are delivered to support growing communities. For this reason, CCBC supports the continued use of detailed studies, testing and modelling to inform land use decisions.

The road improvements proposed in the infrastructure schedule exhibited in 2020 were based on traffic studies and recommendations made by consultants in 2017. The Place Strategy was accompanied by an Infrastructure Schedule that included recommended upgrades to local and regional roads. However, at the time of exhibition, the Traffic and Transport Study for the Rhodes Planned Precinct had not been completed to confirm the impact of the increased dwelling projections on the traffic and transport network.

Therefore, it has not yet been determined whether the range of road improvements proposed on local and state roads will continue to ensure that an acceptable level of performance will be maintained for key intersections on the local and regional road network.

A report commissioned by Council, Rhodes Station Precinct Traffic and Transport Review (Jacobs 2016) noted that rail journeys at Rhodes Station increased from 122,000 journeys per year in 2004 to over 1.8 million journeys per year in 2014, and that the majority of AM and PM peak rail services reached loading capacity in 2015. Inbound T1 Northern line trains via Strathfield have a load of between 135% and 148% of their nominal capacity when they reach the city during AM peak, and 100% leaving the city during the PM peak.

It is also important to acknowledge that the construction of a Metro station at North Strathfield is likely to increase patronage of the T1 Northern line and reduce the capacity of trains for residents in Rhodes.

It is requested that the traffic and transport report that models the capacity of the road and rail system to accommodate the projected 4,260 dwellings be made publicly available.

DPIE and TfNSW confirm the traffic and transport improvements that will be needed to ensure that an appropriate level of access and service will be afforded for existing and future residents of Rhodes. More specifically, clarification is sought from Transport for NSW as to which infrastructure improvements need to be carried out immediately for development to commence, and which infrastructure improvements are required for the dwelling approvals to exceed 3,000.

DPIE and TfNSW confirm the funding mechanism and timing for the delivery of upgrades to the road and rail network and how these arrangements inform the maximum density for the precinct.

Should DPIE form the view that car parking rates would get increased beyond what has been exhibited, this should only proceed with a commensurate decrease in density to maintain the number of vehicle trips generated from development.

Canopy Cover and Green View Index

The City of Canada Bay has set a local government area target to achieve at least 25% tree canopy cover by 2040. This increase in canopy cover is intended to occur on both public land and private land.

The difficulty of highly urbanised environments to increase tree canopy and create greening of the environment is well recognised. For this reason, CCBC commends DPIE in setting out to achieve 25% green view index and 25% canopy cover.

To ensure there is no ambiguity as to how and how much of the percentage of green canopy planting and green outlook is to be achieved by new development, the Place Strategy needs to go one step further and explain the minimum target that must get accommodated and planted on private property. CCBC request that the green view index and canopy cover requirements be incorporated into the proposed Local Environmental Plan (LEP) clause for Resilient Development.

Uhrs Point Launch Pad

CCBC has received funding under round three of the NSW Boating Now Program from the NSW Government to construct a passive craft launch facility adjacent to Uhrs Point Reserve, Rhodes. The launch facility is intended to be used by the Sea Scouts and the Dragon Boat Club and will also be available to the general public for passive craft.

The consultant team at Royal Haskoning Australia (RHA) is currently designing the improved passive craft launch facilities at Uhrs Point. CCBC requests Transport for NSW meet RHA to discuss the proposed ferry wharf in light of the improved passive craft launch facilities to be constructed within close proximity of Leeds St Foreshore where the ferry wharf is proposed to be sited.

Community (Social) infrastructure

In 2017, Elton Consulting was engaged to undertake a social infrastructure study in line with the density proposed at that time. The community infrastructure items exhibited were based on the dwelling yield of 2,800 dwellings. However, higher dwelling yields have since been proposed in the 2018 and 2020 plans. Therefore, the social infrastructure identified within the exhibited Place Strategy is no longer proportionate to the growth anticipated.

DPIE review the Social Infrastructure Assessment prepared by Elton Consulting to align with the revised growth projections for the Rhodes Planned Precinct. Where necessary, infrastructure delivery mechanisms may need to be revised to address social infrastructure needs identified as part of the review.

New School

New Road

The Place Strategy identifies the opportunity to deliver a new public primary school in the precinct. CCBC is supportive of a new primary school in Rhodes.

Schools Infrastructure (SI) has nominated 10sqm of open space be allocated for every student enrolled in the school. For a population of 4,260 dwellings, SI estimates they will require a school with capacity for 1,000 students. Therefore, SI seeks 1 hectare of open space, which is proving to be a significant expectation given the cost of land in the precinct.

Schools Infrastructure has proposed that the northern most new local road be removed from the Place Strategy so as to enable a larger playground to be provided. In lieu of a new road, it has been suggested that a pedestrian and cyclist pathway may be provided outside the school fence in that location.

Cavell Ave, Averill Street and the western end of Leeds Street provide the main traffic routes in and out of the precinct. The new road would provide an additional street frontage for the school with capacity for pick up and drop off space in the immediate vicinity to a school entrance. The new road would also facilitate alternate traffic movements and enable service vehicles and driveways to access adjoining properties away from congested streets. It needs to be demonstrated at the Place Strategy phase of the plan making process that the removal of the road in this location will not have any adverse safety or access outcomes.

CCBC requests that further studies be undertaken to demonstrate that the removal of a new road between Cavell Avenue and Blaxland Road will not generate impacts in relation to vehicle circulation, school and pick-up and drop offs or other safety considerations arising from the operation of a 1,000-pupil capacity primary school.

Where it is able to be demonstrated that the removal of a new road in this location will not give rise to impacts in relation to safety or access once operational, then a publicly accessible through-site pedestrian/cyclist link should be provided at the southern boundary of the new school.

Shared Facilities

SI also proposes co-location of shared facilities with CCBC. The suggestion by SI is for the school hall and open space to be accessed by the community after school hours. SI also proposes that the co-located facilities could offset council's infrastructure requirements and therefore any 'released' funding would be made available to SI.

CCBC appreciates SI's suggestion for shared facilities. Specifically, given the shortage of active open space within the precinct, it is important that any space shared does not limit the ability for Council to fund the delivery of social infrastructure elsewhere in the precinct through conventional methods, such as local infrastructure contribution plans or voluntary planning agreements.

Where shared facilities are provided, there needs to be a genuine directive, commitment and operational support by DET to ensure the long-term commitment to this outcome. There are otherwise myriad problems at the school administration and operational level as to why sharing of facilities are unlikely to eventuate.

Council land

There are several land parcels in the Rhodes Planned Precinct that are under Council ownership. We are aware that certain proponents have suggested the use of Council land without any consultation or agreement from CCBC. Council intends to determine the most appropriate outcomes for these sites in the interest of the community and with particular consideration given to the Place Strategy as exhibited. These outcomes include the provision of social infrastructure, affordable housing and/or the delivery of land uses as contemplated by the draft Place Strategy. CCBC requests that these sites continue to be subject to land use decisions based on good urban design outcomes.

DPIE to notify Council of any unsolicited proposals received which impact upon Council land; and that DPIE agrees such proposals will not be progressed by the NSW Government unless CCBC has responded formally to proceed with discussions relating to the proposal.

Closure of Blaxland Road at Leeds Street

CCBC has plans in place to close Blaxland Road north of Leeds Street and create a public reserve adjacent to the foreshore. This public reserve would continue to serve as boat trailer access to the boat ramp.

It is requested that the Urban Design Report and associated plans for the Leeds Street precinct clearly articulate that all future vehicular access to Leeds Character Area must be via Leeds Street and not rely on access via the northern most section of Blaxland Road.

--- Ends ---



City of Ryde Submission

Draft Rhodes Precinct Place Strategy

27/10/2020

City of Ryde Submission

City of Ryde has been invited by the Department of Planning, Industry and Environment (DPIE) to provide comments on the Draft Rhodes Precinct Place Strategy, which was on public exhibition until 9 October 2020. We have been informed by DPIE that a late submission from City of Ryde will be accepted.

Please find below comments from Council staff to assist DPIE with the refinement of the Draft Strategy. The comments are in relation to two aspects - transport planning and open space. City of Ryde staff will be happy to meet with you to clarify any issues. Thank you for the opportunity for City of Ryde to make a submission.

Transport

The *Draft Rhodes Place Strategy* recognises the importance of access to transport as a key driver in creating a thriving strategic centre. Using a character area master plan approach, an emphasis on improved walking paths and cycleways to improve movement within the Rhodes precinct is appropriate. Utilisation of active transport from surrounding LGAs will be enhanced if existing facilities are extended directly to the existing Rhodes railway station. Better utilisation of the existing railway station, along with improved interchange facilities, will be an important strategy for reducing reliance on private vehicles. Reduced car parking rates applying to new developments will play a key role in traffic management strategies for the future Rhodes precinct.

A particular feature of the *Draft Rhodes Place Strategy* is recognition of future transport infrastructure thresholds. Recognising that additional major transport infrastructure will be required once 3,000 extra dwellings are built represents sensible forward planning. While both road and rail improvements are flagged based on modelling, it is the potential benefits from a true north-south connection that will enhance the performance of Sydney's public transport network. The radial nature of the existing public transport network encourages longer commuting journeys to more traditional centres. A structured approach to transport thresholds and the provision of infrastructure will make the Rhodes precinct more attractive in terms of potential development and investment.

As part of the *City of Ryde Integrated Transport Strategy 2021* currently under development, a metro rail connection between Hurstville and Macquarie Park (eventually extended to the Northern Beaches area) is seen as a key transport improvement that would activate and reinforce the important commercial roles of Macquarie Park and the future Rhodes precinct. Both these centres will play an important regional role in the performance of Sydney's future economy. Developing local opportunities with a strong sense of place has the potential to reduce the number and length of trips required, creating a more attractive and liveable urban experience.

Open Space and Recreation

The comments focus on the Draft Strategy's potential to increase demand pressures on public open space and recreation facilities in the adjacent areas of the City of Ryde.

The comments are based on the following growth targets and assumptions:

- 4,260 new homes and 936 jobs in the precinct over the next 20 years
- 22,950 m² of new public open space, including a new 4,000 m² plaza near Rhodes station, a new 7,500 m² foreshore park and a 15m wide foreshore promenade
- Development in the precinct will be monitored and capped at 3,000 dwellings until essential public transport and road upgrades are on track for delivery

The analysis is based on the full plan (i.e. 4,296 homes) and the capped plan (i.e. 3,000 homes) as follows:

Planning variables	Full plan	Capped plan
Residential dwellings	4,296	3,000
Jobs	936	936
Recreation demand: residents (OR =2.52)	10,826	7,560
Recreation demand: workers (= 30% of resident demand)	281	281
Total recreation demand	11,107	7,841
New open space - passive	2.2950 Ha	2.2950 Ha
	2.1 m ² per person	2.9 m ² per person
New open space - active	Nil	Nil
	Nil	Nil
New open space - total	2.2950 Ha	2.2950 Ha
	2.1 m ² per person	2.9 m ² per person

City of Canada Bay Recreation Planning context

The City of Canada Bay adopted a *Social Infrastructure (Open Space and Recreation) Strategy* in September 2019. Key relevant findings and directions include the following:

Sportsground supply and demand

- Staff and neighbouring councils indicated that sports fields are already at capacity, and there are opportunities to investigate opportunities for synthetic fields and lighting - however being mindful of impacts on local residents and environmental outcomes.
- The majority of survey respondents identified that limited facility capacity is a key pressure on their organisation (53%).
- Peak bodies identified opportunities to increase capacity of fields and courts, share facilities, and use new land such as half courts for training where space for a full court cannot be accommodated.

Open space supply and demand (i.e. m² per person)

There is a total of 39.5m² per person of open space (including all private, Council and Government land) across the City of Canada Bay.

Rhodes (East and West) has one of the lowest per capita provisions of open space – with 14.3m² per person in 2016, compared to the City-wide average of 39.5m², as shown in the table below. This is only around 30% of the City-wide average supply.

CATCHMENT	TOTAL OPEN SPACE (M2)	2016 M ² PER PERSON	2026 M ² PER PERSON	2036 M ² PER PERSON	TOTAL CHANGE IN OPEN SPACE PER PERSON 2016-2036
Rhodes (East and West)	169,312	14.3	11.0	8.2	-6.1
LGA	3,479,818	39.5	34.4	29.0	-10.6

By 2036, the Rhodes provision ratio will decline to 8.2m², compared to 29.0m² for the City as a whole. This represents a 2016 to 2036 per capita open space fall of 43% (compared to 27% for the City).

No doubt, the very low per capita provision of open space in the Draft Rhodes Place Strategy (i.e. 2.1m² per person in the full plan) is a major contributor to this long term per capita open space decline.

It is also noted that Social Infrastructure (Open Space and Recreation) Strategy identified significant shortfalls in the provision of indoor and outdoor sports facilities – including, by 2036:

- 4 indoor courts,
- 7 tennis courts,
- 10 netball courts,
- 1 baseball field,
- 7 full size fields, and
- 4 junior/modified fields.

Discussion

Whilst recognising that there are limited opportunities to provide a significant amount of new open space in middle ring areas like Canada Bay, the very low allowance for open space in the Rhodes Place Strategy – and with no active sports space – will present potential over-utilisation problems for both the City of Canada Bay and the City of Ryde.

For City of Ryde, adjacent sports facilities such as Meadowbank Park, in particular, will likely experience a substantial increase in demand from the incoming Rhodes populations.

Given the high proposed population growth, the already low provision of open space within the Rhodes precinct and the very low provision of new open space proposed in the Draft Rhodes Place Strategy Masterplan, the City of Canada Bay will need to give very careful consideration to how the passive and active recreation needs of the new populations will be met.

In particular, the Council needs to carefully consider how the existing and proposed open space within the Rhodes precincts and surrounding areas will meet accessibility requirements in accordance with the NSW Government Architect's *Greener Places Design Guide* benchmarks, including:

- Access to open space at least 1,500m² within 200m of high-density zones
- Access to open space at least 3,000m² within 400m of low/medium density zones
- Access to active open space within 2kms of the Rhodes Place development zones

Additionally, it is noted that the Social Infrastructure (Open Space and Recreation) Strategy stated (on page 63) that “*based on the SSROC Liveability Benchmarks Study, Council should aim to maintain the current level of provision of open space per person across the LGA*”.

However, the Strategy also concluded that “*there are limited opportunities to provide a significant amount of new open space*” and that the SSROC Liveability Benchmark was not seen as achievable.

The Strategy proposed a more achievable alternative i.e. the World Health Organisation benchmark of 9m² open space per person “*as an appropriate level of provision per person*” (page 63).

At the very least, the City of Canada Bay Council should ensure that this benchmark provides the absolute minimum for open space provision within the Rhodes Place Strategy area.

Where possible, space should be provided in excess of this minimum in accordance with the needs identified in the recent Social Infrastructure (Open Space and Recreation) Strategy and to minimise the potential for over-use of sport and open space facilities in Meadowbank and other precincts within the City of Ryde.

Parramatta River Catchment
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Friday, 23 October 2020

RE: PRCG Submission Rhodes Precinct Plan

Department Planning, Infrastructure and Environment

The Parramatta River Catchment Group (PRCG) welcomes the opportunity to provide a submission for the Rhodes Precinct Plan.

The Parramatta River Masterplan, published in 2018, calls for a healthy, liveable and swimmable river by 2025. To achieve this outcome, the plan outlines 10 steps to make this a reality.



Source: [Parramatta River Masterplan](#)

Parramatta River Catchment Group

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**Parramatta River
Catchment Group**



**LET'S MAKE OUR RIVER
SWIMMABLE AGAIN BY
2025**

Step 4 calls for a consistent policy approach to best practice management of our waterways through development controls, with an aim to reduce runoff (step 5) and improve water quality outcomes. This will form a key part of making the river swimmable as the Central River City develops.

The explanation of intended effect (EIE) and Place Strategy/Urban Design Report outline a development control framework for a critical area of the Parramatta River catchment. Adjacent to this precinct is McIlwaine Park. This area has been identified as a priority site in the Parramatta River Masterplan and will be activated for community recreation in and along the River in 2021.

Therefore, our submission will be focused on scrutinising the outcomes of the proposed development controls against our 10 steps for a living river to ensure positive environmental health outcomes for the adjacent waterway and urban form proposed in the precinct.

State Government policy mandate for healthier waterways

The State Government has recognised the importance of healthier waterways through its vision for Sydney, 'Our Sydney 2056', the Central District Plan, the draft Coastal Management Program scoping study for Sydney Harbour, and the Marine Estate Management Strategy. All of these outline the vision for a central river city with healthy clean waterways. It further recognises the importance of an *integrated* blue-green vision for the future of our urban form, through its 'draft Greener Places Design Guide', the Premiers Priorities for a Greener Urban form, and the blue-green grid outlined by the Government Architects Office. This precinct can meet these goals, if considered in a manner that reflects Water Sensitive Urban Design, promotion of urban greening, and best practice stormwater management.

Parramatta River Masterplan work to date – an evidence base for development controls providing environmental benefit to the river and urban form

As identified in the Parramatta River Masterplans Water Quality Modelling report¹, stormwater runoff is one of the most significant contributors to the degradation of the Parramatta River. Urbanisation results in an increase in hardstand area contributing to higher volumes of stormwater carrying increased pollutants to waterways. Our work has encouraged the existing planning system to promote Water Sensitive Urban Design (WSUD) as part of an Integrated Water Cycle Management (IWCM) outcome through Step 4 of the Masterplan.. Our final report, outlining planning reforms to support the Masterplan, will soon be released, the draft is available here:

<https://www.ourlivingriver.com.au/our-plan/masterplan-dashboard/4-standardise-the-standards/>.

The report attempts to formulate standardised planning controls across the catchment to mitigate the impact of stormwater. It shows how to utilise the levers available to government through urban planning to create a Parramatta River that is swimmable, clean and healthy in the face of significant intensification of development within the catchment.

¹ <https://www.ourlivingriver.com.au/content/uploads/2018/07/Where-can-we-swim-by-2025-FINAL-compressed-1.pdf>

Parramatta River Catchment Group

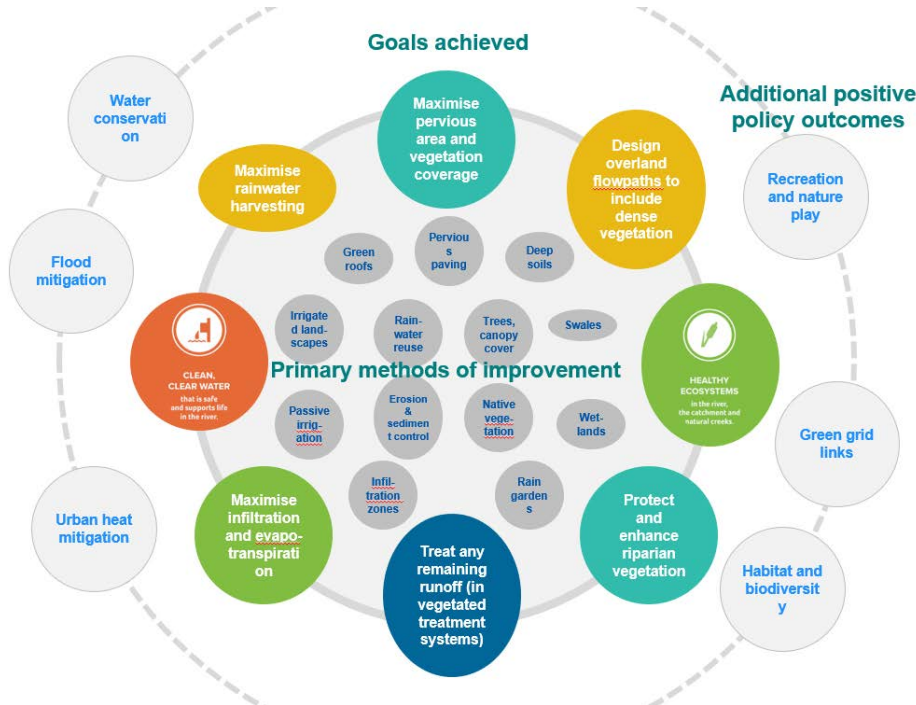
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The below diagrams set out our policy reform approach:



Source: Parramatta River Masterplan – step 4 standardising the standards - ‘draft Recommendations Paper’

We reason through our ‘recommendations paper’ that best practice stormwater management in urban planning policy is critical to fulfilling the vision of a greener urban form, as well as utilising water in the most effective manner possible. If managed correctly, stormwater provides the foundation of a lush, vibrant, green urban form, and supports drought proofing the city.

With the State policy and Parramatta River Masterplan step 4 goals in mind, our submission is focused on how water is being managed within the precinct as outlined by the documents under review, with a focus on:

- Commitment to open space and landscaped area
- Tree canopy coverage assurance in the public and private domain
- Development controls that promote best practice stormwater management
- Infrastructure dedicated to the management of stormwater

Open space

The PRCG strongly supports the new open space and promenade proposed at Leeds Street. However, we query on the mechanism for which open space is to be guaranteed. Currently, the protective mechanism for guarantee seems to be a sun access clause as an additional local map and provision, as demonstrated by the EIE.



**Parramatta River
Catchment Group**



**LET'S MAKE OUR RIVER
SWIMMABLE AGAIN BY
2025**

We propose that a more resilient and committed mechanism, that land be dedicated back to Council through an establishment of an RE1 public recreation zone for the proposed promenade. The combination of B4 mixed use, its permissibility and the 8m minimum height mean a simple change to the sun access clause would enable development right to the foreshore, whereas a dedicated zone and dedication of ownership to Council would ensure a stronger long term public accessibility land use outcome. This method is shown to be successful in Rhodes West and many other areas and ensures maintenance in perpetuity. A further risk is that unless there is strong agreement that all sites will be developed in unison, there is some risk that the promenade will be opened in a fragmented fashion, limiting public accessibility.

Furthermore, some more detailed consideration of the level of sun access protection would be welcomed. For example, would it be a 24 hour sun access protection area, or would it be more limited? The north orientation of the open space at Leeds Street would virtually guarantee such an outcome. Some clarity would be welcomed for other areas that do not have an exclusively north orientation.

However, in totality with all principal controls considered, currently this would generate a successful level of open space in the area under the current proposal.

In the alternate, we recommend that the proposed controls and explanatory documentation provide some notes on how this control scheme will ensure a publicly accessible foreshore for Leeds Street for the long term.

Regarding opportunities, due to the nature of the proposed design of the promenade being hardstand, there is ample opportunity for stormwater treatment infrastructure in this area. This could be in the form of a Gross Pollutant Trap under the promenade with reoriented pipes to the area for treatment purposes, considered seawall design that promotes natural habitat growth, or a multi-site below ground stormwater recycling system, which would be efficient in overflow or release scenarios due to its immediate proximity to the open space foreshore and could be pumped back into the proposed mixed use development. This could be reflected in an amended infrastructure table.

An innovative example of this in practice for a mixed-use development with significant residential land use is at Green Square under carriage of the City of Sydney.

Permissibility for water supply systems

The mechanism to enable water supply systems for R4 high density residential is fully supported by the PRCG. DPIE should explore how to incorporate this permissibility into R4 development generally or pursue this more readily on a wider scale, as it promotes best practice water management for large sites and promotes water sustainability and resilience for high impact development. This will also assist in the management of stormwater by promoting retention outcomes for high density residential/ mixed use development.

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We also support the requirement for dual piping in the EIE, however we ask for greater clarity in how this will be ensured in practice. Will this form part of principal controls as an additional local clause or will it fall primarily under DCP requirements (to be developed)?

Design excellence provisions

The PRCG fully supports the requirement for design excellence in the EIE. However, to more strongly align with the environmental positives touted throughout the documentation, there should be some call to action regarding the environmental quality of design under these requirements.

The exemplary baseline water and environmental requirements already established through the EIE and supporting documentation can enable this. It provides a strong framework for the design excellence clause to ensure positive environmental and water management outcomes in any design.

It is proposed that the design excellence clause have a separate subsection that engages with environmental considerations specifically, with the following as an example:

- How the development addresses the following environmental matters:
 - o Where applicable, Greenstar, BASIX and any other relevant environmental performance outcome.
 - o The considered design of green-roofs and/or walls to promote urban greening outcomes.
 - o Water Sensitive Urban Design Measures in any proposed open space including
 - Tree canopy coverage in the private domain.
 - Semi permeable materials
 - Considered treatment of on-site flows and stormwater (i.e. going beyond a simple cartridge filter)
 - On site water recycling and reuse
 - Maximising landscaped area and use of landscaped area such as for communal space or activated site through links.
 - Dedication to blue-green infrastructure in the public domain.

If these considerations could be imparted into any design excellence criteria specific to Rhodes, it could significantly contribute to positive environmental outcomes for the precinct overall. It would give developers a roadmap for which to engage in, particularly for when an architectural design competition is required.

BASIX

The mechanism to give bonus floorspace to exemplary BASIX performers is welcomed. The PRCG postulates that, either in this, or future precincts, a tiered approach could be explored where say:

- 5% FSR granted for BASIX energy 40/ water 60 performers
- 10% FSR granted to BASIX 80 performers



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This would capture a significant chunk of population having very strong overall energy and environmental performance as the city grows, as these high-rise developments can offset the cost from any such approach more readily.

Furthermore, this mechanism is rarely pursued in masterplanning (see Carter Street as an example where such an approach is missing). It would be welcomed if DPIE could incorporate this philosophy in its standard operations for masterplanning moving forward, such is the potential positive outcome on the overall health of the urban form generated by BASIX and FSR bonuses.

The PRCG is also aware of the fact that BASIX is currently under review. We request that this mechanism be scrutinised in accordance or in collaboration with that DPIE unit to ensure the vision of this control is maintained in any reform.

Satisfactory arrangements and infrastructure table

The documents provided outline a commitment to sustainability as part of its requirements. The use of a satisfactory arrangements clause offers a flexible mechanism by which infrastructure is delivered in the precinct and is welcomed.

However, regarding the table of infrastructure itself, there is a distinct lack of commitment to 'green' or 'blue' infrastructure.

We propose an expansion to the infrastructure table that ensures that environmental infrastructure is considered and funded through proposed contributions moving forward that includes:

- Satisfactory tree canopy coverage for new public roads and pedestrian/ cycling routes (see Carter Street for indicative green designs for streetscape)
- Assurance of Water Sensitive Urban Design outcomes in public open space (detailed above for opportunities)
- Provision of stormwater treatment infrastructure at key areas of Leeds Street and Mcllwaine Park, such as Gross Pollutant Traps, considering increased swimmability requirements (water quality outcomes) required under the Parramatta River Masterplan.
- Sediment treatment and habitat nourishment (seawall activation) for the surrounding waterway, as part of say foreshore activation, to revitalise the marine habitat at both Leeds Street and Mcllwaine Park and promote swimmability outcomes for Mcllwaine Park.
- Potential for a public water recycling facility, which could make efficient use of the proposed dual piping for the precinct and would provide water for the entire precinct potentially.

The common theme here is that there is a more business as usual approach to infrastructure in the precinct, which does not match the comprehensive exploration on how to better promote environmental outcomes in the private domain. This is a missed opportunity as any components missing from this list will not be within the scope of these 'satisfactory arrangements' and will not be funded through any contributions or voluntary planning agreement regime.

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Swimsite controls

The PRCG is aware that the current Sydney Harbour REP 2005 is being reformed by incorporating it into a Catchment SEPP. We request that any amendment to the REP have consultation with the team undertaking this process to assure that the proposed permissibility carries over into the Catchment SEPP.

Furthermore, upon analysis of the REP itself, public swimming enclosures are currently permitted with consent as they are not covered under the land use table in the REP. There is a subclause in the land use table that states that any land use type not covered in the table is permitted with consent.

Public water recreational facilities (i.e. kayaking etc) is also permitted with consent along the foreshore, of which McIlwaine Park could potentially be in the future, if water quality testing outcomes or site limitations are not ideal for swimming.

Swimming pools are a different type of development and are totally enclosed (not technically exposed to the river and with additional regulatory requirements), and therefore are currently prohibited. We query the pursuit of this additional permissibility may indicate that any public swimming enclosure is currently prohibited but upon our analysis of the REP, this is currently permissible.

We ask that you liaise internally and with Canada Bay Council on what the proposed swim site is to be. If it is to be a public netted enclosure, then this proposed change may not be required due to permissibility being already granted under the REP (with consideration of a revised land use regime under the Catchment SEPP potentially changing this). However, if it is to be a swimming pool, then the change will need to occur. If it is to be for water recreation, then this is currently permissible under the REP.

We also ask that there be specificity in if this change will apply to the whole REP/ future Catchment SEPP, as it could affect future swim sites not within the Rhodes precinct along the river.

This is a query that needs to be resolved as our identified swimsites under the Parramatta River Masterplan often fall under this REP, and the permissibility and type of public swimming recreation facility is a key factor in any proposed future outcome for our Masterplan.

Parramatta River Masterplan is not in draft as of 2020

We also ask that mention of our Masterplan being in a draft state be changed to state the 'Parramatta River Masterplan'. It was published in 2018 and has been endorsed by all our partners.

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Thank you for the opportunity to provide a submission and thank you also for the extension of time, it is much appreciated.

Yours sincerely,

Nell Graham

Parramatta River Catchment Coordinator

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16 October 2020

Brendan Metcalfe
Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022, Parramatta NSW 2124

Dear Brendan

Thank you for providing Transport for NSW with the opportunity to participate in the development of the draft Rhodes Precinct Place Strategy. We look forward to collaborating with you on the development of a program of work to enable the vision of the strategy to be realised.

Transport for NSW supports the staged development of the Rhodes Precinct, particularly the need for the interim development cap at 3,000 dwellings to ensure that essential transport infrastructure is in place prior to the remaining development being approved for construction.

Funding availability for infrastructure will determine the timing of its delivery. Upgrades will be required at the railway station and interchange, key road intersections, active transport routes and for the new ferry wharf, in addition to other State Infrastructure (such as the primary school). The development of a cross-agency Business Case, led by DPIE, is encouraged to address the priority of State infrastructure funding, and assess how best to apply any funding from the proposed Voluntary Planning Agreement(s).

Please note that a major challenge for vehicle access into the Rhodes Peninsula is the intersection of Concord Road and Homebush Bay Drive. This unfunded priority will be required for the realisation of the Place Strategy, but is not currently referenced in the Place Strategy.

In addition to infrastructure provision, it remains important that car parking within the Rhodes peninsula is minimised to reduce the impact on the road network. Transport for NSW supports the establishment of the maximum car parking rates within the Rhodes Precinct Explanation of Intent document, and strongly encourages the establishment of all day and night short stay/timed on-street parking to better manage potential impacts of residents parking additional cars on-street.

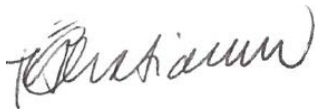
Transport for NSW is of the view that as part of any Satisfactory Arrangements Clause, that developers prepare and monitor a Travel Demand Management Plan to minimise the traffic generating impacts of future developments in the Rhodes precinct, and encourage sustainable travel behaviours for travel to, from and within the precinct.

The Travel Demand Management Plan should include, but not be limited to, the following:

- Improved pedestrian and active transport connections to the existing bus stops and rail station, and the future wharf and school;
- Consideration of decoupling parking spaces from the proposed residential apartments;
- Consistent application of the maximum parking rates; and
- Regular monitoring and reporting on the effectiveness of demand management measures.

If you have any further questions, Nerida Morgan, Principal Transport Planner, would be pleased to take your call on 0418266459. I hope this has been of assistance.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Fiona Christensen', written in a cursive style.

Fiona Christensen

Executive Director Planning for Places

GOVERNMENT ARCHITECT NEW SOUTH WALES

17 October 2020
Malcolm McDonald
Executive Director,
Eastern Harbour City
Malcolm.McDonald@
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PROJECT: RHODES PRECINCT

Review of Draft Planned Precinct, Urban Design Report

Dear Malcolm,

Thank you for referring the draft Urban Design Report for review.

Overall, the proposal provides for ambitious densification within the precinct with serious attempts at strategies for mitigating some of the density impacts.

Our comments have been structured around a review of the proposed Best Practice Benchmarking and Criteria. In addition, 'positives' and 'areas of concern' in the Urban Design Report, have also been identified.

1. BEST PRACTICE BENCHMARKING AND CRITERIA:

Criteria have been set around 9 key areas: Shared Streets, Greenery, Tower Design, Podium Design, Unit Mix, Parking, Overshadowing, Sustainability and Transport Serviceability:

- Includes alternatives for dealing with density impacts and to meet standards.
- Some criteria don't have measurable benchmarks, and others don't seem to have been applied to any of the sub precincts at all (eg Shared Streets).

The following address three of the criteria which are the most challenging urban design issues for Rhodes - Greenery, Overshadowing and Tower Design:

1.1 Greenery: Three strategies are proposed, most notable being a **Green View Index (GVI)** - p92 UD report:

- an alternative strategy to meet tree canopy targets (p186 UD report)
- intended to measure what a person sees
- allows for planting in other locations (including vertical surfaces) to count as tree canopy.

There are examples given, however:

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- it allows for potential reductions in street tree sizes and numbers if vertical planting is provided
- unclear how alternative planting is measured to meet the canopy target (25% for Rhodes)
- maintenance of vertical planting in private ownership is unclear
- this approach doesn't seem to have been used or tested elsewhere

1.2 Overshadowing:

- standard is for no overshadowing / no increases to overshadowing in 5 major public parks for key periods during the day - from 8-9am up to 12.30 and 2pm.
- These solar access 'windows' are similar to CBD provisions for a predominantly working population (lunch time users) and are completely unsuitable for a residential community that will use its parks at **all times** of the day, not just at lunchtimes.

Open Space (included under Overshadowing)

- Open space analysis (p95 of the UD report) adopts a benchmark of 9sqm pp including streets (WHO standard), to demonstrate adequate open space.
- This benchmark is low and out of date. A better guide is the Draft Greener Places Design Guide (GPDG) which sets out more comprehensive standards for public open space (both quantum and performance) with some flexibility to innovatively interpret the standards to suit local conditions. For example, the limited open space opportunities at Rhodes could be leveraged, through strategic and enhanced foreshore connections, into a substantial open space network that better meets the needs of future communities.
- Thru site links, forecourts and shared streets are counted as Public Open Space, even if enclosed within development sites, shared with traffic or available for private lease (such as outdoor dining areas). This is not genuine public open space.

1.3 Tower Design:

Tower floor plates (p100 UD study):

- Limiting tower floor plate size is supported and is consistent with the intent of the ADG to achieve cross ventilation targets, manage bulk and

scale and promote social recognition through setting a max number of units/core and apartments sharing a single lift. (Ref ADG Part 4, p97).

- Nevertheless, these are still large floor plates where natural ventilation may be difficult to achieve. While the controls favour a compact floor plate shape (to minimise visual impact and achieve required separations from adjacent towers), articulation in the floor plate should also be noted as a requirement to achieve better natural ventilation.

Tower separation

- Introducing tower separation controls is commended as it acknowledges the significant impact of height on amenity. It is noted that this is consistent with the objectives of Part 2 of the ADG standards in relation to building separation. In applying this control, however, heights and separations should also be analysed in cross section, as building separation is important to consider as proportional to height – and not simply a minimum of 24m over 9 stories, or 40m over 20 stories.

(ADG ref: Part 2, p37: *Increase building separation proportionally to the building height to achieve amenity and privacy for building occupants and a desirable urban form*)

- in addition to setting separation standards it is important to ensure that articulation of floor plate and built form is still encouraged/required.

(ADG ref: Part 2, p32 - *provide opportunities for building articulation and creativity within a building envelope by carefully setting the allowable floor space*).

Wind Mitigation (p106 UD study):

- Measurable performance outcomes are not provided – eg max wind speeds for active frontage areas, major thoroughfares, adjacent streets and public places.

2. POSITIVES:

- Strategy for continuous foreshore access - connecting under both bridges, though these are compromised through being visually obstructed by development.
- Increased permeability at new mid-block streets between Cavell Ave and Blaxland Rd

- FSR transfer (p85 UD study) incentivises landowners to provide part of their site for new streets or open space, and still benefit from FSR for that land.
- Criteria for Transport Serviceability provides for redevelopment to be matched against capacity of transport infrastructure (p21 UD study), though unclear how this will be implemented.

3. AREAS of CONCERN:

3.1 Foreshore Park (Leeds St Precinct) – significant concerns with size and accessibility:

- at 0.75ha it is small, and inappropriately benchmarked against other small foreshore parks that aren't directly comparable with Rhodes, (p130-134 UD study), rather than other Parramatta River headland parks eg Ballast Pt Park (2.5ha), Balls Head (9ha), Cabarita Park (10ha), Pirrama Park (2.8ha), Putney Park (7.5ha), Wentworth Point (3.5ha)
- To maximise its role as part of a contiguous open space network, there should be much greater visibility and connection to adjacent open spaces. Current configuration of development sites will largely conceal the park from adjacent foreshore approaches and compromise amenity through overshadowing etc. As a minimum:
 - the westernmost site should set back from its northern boundary to align with the central sites and open up views and access from John Whitton Reserve and Mill Park.
 - setting back the easternmost site should also be considered to open up views and access to Uhrs Point Reserve and, via Llewelyn St, to McIlwaine Park.
- Enclosed and overlooked by development on three sides, and given the lack of visibility and accessibility, the park will have a distinctly 'private' feel that subtly discourages outsiders.
- park has no street frontage at all. GPDG recommends min 50% road frontage for local parks, and all of the cited precedents have direct road frontages.
- connections from Leeds St are 'indicative' but should be fixed with generous corridors that directly align with Cavell Ave and Blaxland Rd to ensure that the park doesn't become privatised.

- LEP maps show the space zoned for mixed use, with height and FSR provisions. Rezoning to RE1 with no height or FSR provisions (as for all other foreshore open spaces at Rhodes) could better secure this important public amenity.

3.2 Traffic and transport

- Pedestrian Priority Link to Wharf is at the end of a dead-end street. the Ferry wharf should be directly visible from main street approaches ie Cavell Ave (Community Spine) and Blaxland Rd (Commuter St).
- There are no bus stops close to the ferry wharf. The nearest is over a block away from the proposed Priority Link to the wharf

3.3 Station Bridge Plaza and Bridge (Leeds St Precinct)

- The need for an overpass is questioned. If there was suitable open space within the precinct then there would not be a need to provide access to McIlwaine Park
- in principle, pedestrian overpasses and underpasses are considered poor urban design practice as they direct pedestrians away from streets and reduce public domain activation.
- the overpass 'stub' is between buildings and largely out of public view.
- No detail provided to show the visual impact of ramps and lift at the McIlwaine Park end of the overpass and the degree of park 'landtake' required to accommodate the lift
- If the overpass is essential, better visibility is essential. Consider relocating the overpass to northern edge of Chris Tucker reserve with on-grade access at the station end (Blaxland St) to improve visibility from public domain.

Please contact me if you require clarification or would like to discuss further.

Sincerely,



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DOC20/778579-4

Department Planning, Industry and Environment
Place, Design and Public Space
(Attention: Director of Eastern and South District)
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Email www.planningportal.nsw.gov.au/Rhodes

Dear Sir

Draft Rhodes Precinct Place Strategy

Thank you for the opportunity to review the Draft Rhodes Precinct Place Strategy that has been on public exhibition and forwarded to the Environment Protection Authority (EPA) for comment on the 7 September 2020.

The EPA provides the following comments (**Attachment A**) for Department of Planning, Industry and Environment Place, Design and Public Space's consideration. These comments relate to the following matters:

- Air quality
- Noise
- Water quality
- Waste and resource recovery
- Contaminated land management.

The EPA would be able to meet at a mutually convenient time to discuss any of the enclosed comments. Should you require any further information, please contact Mr Paul Wearne on (02) 4224 4100.

Yours sincerely

09/10/2020

GISELLE HOWARD
Director Regulatory Operations Metropolitan

Attachment A

Attachment A

Air Quality

The Greater Sydney District Plans include an objective under ‘sustainable and resilient city of “*exposure to natural and urban hazards is reduced*”, and states that, “*effective planning can reduce the exposure to natural and urban hazards*”. Urban hazards are identified as including noise, air pollution and soil contamination. The Strategy would benefit from recognising the concept of urban hazards, including identifying opportunities to help preserve amenity and protect the health of the community by managing exposure to air and noise pollution.

Measures such as access to public transport, precinct design based on active transport and parking measures to manage demand are supported. However, the main risk for the precinct in terms of air quality is potential exposure of sensitive land uses, including proposed high density residential and aged care and any future childcare facilities, to traffic emissions from Concord Rd. Two of the precinct areas adjoin Concord Road directly – Cavell St and Rhodes Station East. Concord Road is a major thoroughfare carrying nearly 100,000 vehicles a day and is therefore subject to the *Infrastructure SEPP* and the [Development near rail corridors and busy roads - interim guideline](#). While supporting information does propose additional setback to mitigate noise and promote privacy along Concord Road, it is important that potential air quality impacts are also considered, and appropriate measures applied.

It is suggested that criteria based on protecting sensitive land uses from traffic pollution should be included in the specific building design criteria for the overall precinct and the areas adjacent to Concord Rd. The Interim Guideline recommends the following setbacks of sensitive land uses from busy roads that should be applied to the design of the precincts.

Route type	Minimum separation distance measured from the kerb
Freeway or main road (with more than 2500 vehicles per hour (60,000 AADT), moderate congestions levels of less than 5% idle time and average speeds of greater than 40 km/hr	20m
Congested collector road (traffic speeds of less than 40 km/hr at peak hour) or a road grade > 4% or heavy vehicle percentage flows > 5%	10m
Area significantly impacted by road tunnel portal (road tunnel portals, major intersection/roundabouts, overpasses or adjacent major industrial sources)	60m

The following measures recommended in the Guideline are also applicable to Concord Rd, and on land adjacent to any road carrying more than 40,000 vehicles a day:

- Vegetation be provided between the road and buildings with sensitives users (residences, childcare, aged care).
- Parts of the building with sensitive uses be set back by the minimum separation distances in the above table. Note that vertical distance is included in the calculation.
- Where separation distances are not achievable, ducted mechanical ventilation for the supply of outdoor air be required in compliance with AS1668:2: *The use of ventilation and air conditioning in buildings – Mechanical ventilation in buildings*. The air intake can be sited to draw air away from the polluting road, or else use particle filters.

Zoning should also restrict childcare centres on lands that adjoin Concord Road.

The proposal has positive features for promoting dispersion of pollution and mitigating exposure, including the varied height and design of towers and the use of vegetation. While the design has considered the implications of wind it appears not to include consideration of air and its circulation.

Natural ventilation should be an important design element because, even near busy roads, apartments can be opened in the evenings if traffic is considered to drop below the recommended design thresholds.

It is also important that microclimates are understood to help support the sustainable design of buildings that capitalises on natural ventilation and minimises the risk of canyoning.

Noise

The management of noise should be a key consideration in relation to helping shape the precincts to deliver the amenity outcomes being sought in the Strategy. This is also important in helping to support key actions in the Eastern City District Plan to deliver healthy, sustainable and liveable places. For example, the management of noise should be a key consideration in areas where amenity in public domains needs to be maintained or enhanced in key precincts as they transform to ensure homes are designed to minimise environmental impacts.

In this regard, it is important that adequate planning controls are in place to identify and manage noise-based land use conflict issues. The potential to address noise issues retrospectively following development can be challenging and expensive and lead to community complaint, especially where there is a proposal for an extensive night-time economy. Community complaints of this type can be resource intensive and at times unresolvable.

The EPA considers that implementing noise control at a strategic planning level provides the most effective means of minimising noise impacts on communities. This is best achieved by applying the following hierarchical approach to noise control.

1. Spatial separation of incompatible land use through appropriate zoning and placement of activities to minimise noise-related land use conflicts.
2. Minimising noise emissions at source through best practice selection, design, siting, construction and operation as appropriate.
3. Reducing noise impacts at receivers through best practice design, siting and construction.

Sustainable land use planning and careful design and location of development offers the greatest opportunity to manage noise. Noise generating activities and noise sensitive areas should be separated where practicable. For example, separating incompatible land uses with commercial buildings (including those with night-time operations) or recreation space or similar will provide a physical barrier and/or spatial separation. Retrospective control options are usually limited and more expensive.

In general, spatial separation has been incorporated into some of the design elements of the precincts, however, there are more nuanced areas within the proposed Precincts that will require more specific noise considerations.

Guidelines including the [NSW Road Noise Policy](#) (DECCW, 2011) and the [Rail Infrastructure Noise Guideline](#) (EPA, 2013) provide guidance in relation to land use planning to manage road and rail noise respectively. These complement planning guidance provided in the [Development near rail corridors and busy roads – interim guideline](#) (Department of Planning, 2008) which recognises the need for judicious land use planning, architectural design, building orientation and good internal layout to achieve acceptable acoustic amenity for residential development in proximity of busy transport corridors. Careful planning is also required in areas undergoing transformation where new housing/sensitive land-uses is proposed in the vicinity of major roads and rail infrastructure and where there is expected future traffic growth.

This type of approach has been applied successfully to provide an early indication to potential developers of expected noise emission requirements, and to preserve the noise amenity in adjacent areas. It also presents an exciting opportunity to be a leader in the development and consideration of vibrant and flexible soundscapes in the planned public spaces. For example, there are several

open spaces identified in the strategy where there is an opportunity to develop the soundscape of public spaces to make them more inviting to the local community. In areas such as Rhodes East, soundscapes can be managed by planting trees which encourage bird life, as well as adequately separating busy roadways from public spaces where possible. This approach should be a key element in helping deliver the domain outcomes being sought for the design of the precincts.

There are a range of opportunities that can help better address noise management approaches to improve local amenity and deliver desired public domain outcomes. For example, actions that encourage good built form outcomes through Design Excellence including expectations that deliver high amenity/liveability outcomes should be supported. Careful planning for noise is also needed where night-time economies are being established or activated and mixed-use development is being proposed as vehicles and plant have the potential to cause significant disturbance to adjacent residential developments. The strategy could also provide an opportunity to explore the performance and adequacy of existing planning controls and make them contemporary where required.

A range of noise mitigation strategies can also be implemented when designing key sites in the precincts to manage unavoidable noise impacts. This can include the application of noise control measures into the building design to ensure internal noise levels are acceptable. Further information is available in the *Infrastructure SEPP*, [Noise Guide for Local Government](#) (EPA, 2013) and the *Department of Planning's Development Near Rail Corridors and Busy Roads—Interim Guideline*.

With the Strategy including directions on resilience, it would also benefit a broader discussion and inclusion of urban hazards to support the planning priorities in the Eastern City District Plan. For example, these could include potential noise impacts. Where practicable, consideration should be given to identifying, creating, and preserving areas of quiet amenity, particularly in urban areas to improve liveability.

Water Quality

The Strategy has an important role to help recognise and support key sustainability outcomes in Eastern City District Plan. In particular, the design of key sites in the precincts play an important role in contributing to actions to protect and improve the health and enjoyment of Sydney Harbour and the District's waterways. In particular, it is important that future growth associated with Rhodes contributes to the 'Our Living River' initiative for the Parramatta River.

It appears the Strategy does not include any information on how the design of the precincts will assist in helping to deliver the above actions. In this regard, the Strategy would benefit from promoting and supporting the following key principles:

- development that maintains or restores waterway health to support the community's values and uses of waterways such as aquatic health and recreation; and
- encourages integrated water cycle management that includes sustainable water supply, wastewater and stormwater management and reuse and recycling initiatives where it is safe and practicable to do so and provides the best environmental outcome.

The District Plan include actions to improve the health of catchments and waterways through a risk-based approach to managing the cumulative impacts of development. Implementation of this action is supported through application of the OEH/EPA [Risk based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions \(Risk-based Framework\)](#)

The Strategy provides an opportunity to recognise this Risk-based framework to help inform the design of water management and associated infrastructure needs and identify practical, cost-effective management actions for supporting waterway health outcomes that reflect community expectations as set out in the [NSW Water Quality and River Flow Objectives](#).

Approaches that help support the delivery of water in the landscape are supported in particular integrate Water Sensitive Urban Design (WSUD) and other sustainability initiatives into the design of the space. Such approaches can help to underpin the delivery of green infrastructure and open

spaces to keep urban areas cool, encourage healthy living, enhance biodiversity and ensure ecological resilience. WSUD can improve the water quality and ecology of waterways to maintain or work to restore the community's values. For example, the successful establishment of a street tree will be dependent on water and if appropriately designed a street tree pit can also improve stormwater quality.

Approaches such as integrated water cycle management should also be encouraged and promoted in the strategy as they can provide a least cost approach to:

- meet waterway health and community urban amenity needs.
- reduce and safely convey local flood waters; and
- increase potable demand reductions through the using of innovative lot and/or precinct scale alternative sources, including effluent recycling and stormwater harvesting and use.
- Ensure land legacy contaminants are appropriately addressed and not remobilised into aquatic environments.

In this regard, the provision of dual water pipes to maximise the reuse of treated wastewater as a resource, is supported. However, it is recommended that NSW Health should be consulted in the design of such systems.

The Strategy would also benefit information from Sydney Water on whether there are any capacity issues with the existing wastewater system and to ensure that any changes in response to growth across the area will not compromise the environmental performance of this system.

Integrated approaches to water management, including WSUD and other Green Infrastructure measures are reliant on effective ongoing maintenance and monitoring. To address this issue, the Strategy would benefit the inclusion of information to better understand those financial mechanisms and management arrangements that can help deliver the ongoing performance of such measures.

Waste and Resource Recovery

The Strategy would benefit recognising the [*NSW Government's 20 Year Waste Strategy*](#), which is currently under development. The *20-Year Waste Strategy* will set the long-term vision for how NSW will manage its waste. It will include measures to reduce waste, increase recycling, plan for future infrastructure and create new markets for recycled products. The *20-Year Waste Strategy* will also be a roadmap for NSW to transition to a circular economy. It is recognised that a range of State Government strategies, policies, strategic plans and planning instruments will help to enable a circular economy. A draft of the *20-Year Waste Strategy* is expected to be released in early 2021.

The Strategy would benefit introducing the concept of a circular economy (i.e. not just referring to satisfying Council general waste and recycling requirements) but recognising the opportunities to help deliver circular economy infrastructure and design as an approach that needs to be planned for in the precincts. To help transitioning to a circular economy, the following definitions are provided to help guide the development of the Strategy.

Circular Economy Infrastructure focuses on facilities that collect used resources, reuse, repurpose or remanufacture materials and goods, to retain their productive value and prevent their disposal to landfill. Examples of circular economy infrastructure includes reuse and repair facilities, sharing and leasing facilities, reverse vending machines, community recycling centres, collection points for producer responsibility schemes, material reprocessing and remanufacturing, anaerobic digestion, washing or pelletising facilities, reverse logistics facilities.

To help guide the design of building and urban typologies in relation to delivering a circular economy, the following additional definition is proposed:

Circular Economy Design is a set of design principles applied to buildings, infrastructure and public domain precincts that maximise the circularity of the materials used in construction. This includes designing in a way where the materials can be easily identified for future recovery; designing

buildings and infrastructure so they can be disassembled or demolished in a way that will maximise the value of the recovered materials; designing public spaces and precincts to allow for the separation of waste materials in a way that will maximise their value; designing to maximise the inclusion of recovered materials.

Further information on a circular economy can be found in the [NSW Circular Economy Statement](#).

The provision of circular economy infrastructure that maximises the value of waste materials and prevent incidents of littering and illegal dumping while interacting with public spaces would also be encouraged.

The Strategy would also benefit the inclusion of the following key principles:

- Development is designed for effective waste and resource recovery by allowing for waste services to occur in a safe, seamless and timely manner: and
- Systems are designed to maximise waste separation and resource recovery and innovative and best practice waste management collection systems and technologies are supported where appropriate

Previous studies for Rhodes East had recommended the use of vacuum systems for managing waste, however it appears such an approach has not been further considered in the current Strategy. The benefit of such systems is they provide for a precinct-scale solution for integrating waste and recycling collections across the entire site especially in areas where there is limited space. They can also help to address the challenges of road, building design and service to cater for waste management but also provide efficient separating of waste streams like organics, plastics, paper/cardboard and general waste. The Strategy provides an opportunity to consider such initiatives which would also help deliver key sustainability actions in the Greater Sydney Regional Plans and supporting District Plans.

The following guidelines should also be consulted to assist in the planning of the precincts:

- The [Better practice guide for resource recovery in residential developments](#) should also be consulted especially where medium and high density residential development is proposed to ensure these buildings incorporate innovative and well-designed waste management systems.
- The [Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities](#) (EPA, December 2012).
- The [Better Practice for Public Place Recycling](#) (DEC 2005) provides information on standards for recycling systems in public places, such as parks, shopping centres, footpaths, bus-stops, etc.

Contaminated Land Management

The EPA has always recognised, even in preceding EPA responses on East Rhodes, that this precinct planning presents opportunities to remediate contamination in the area and to revitalise the precinct.

The EPA notes that the Strategy highlights a design that provides diverse opportunities to engage directly with the water edge and includes a proposal to amend the SREP (Sydney Harbour Catchment) 2005 to permit public swimming pools.

The EPA has previously flagged potential contamination issues in the foreshore and areas that are yet to be investigated. These foreshore areas of the Parramatta River have legacy contamination issues from past industrial activities (including but not limited to, dioxins, heavy metals and hydrocarbon compounds) that require assessment to understand potential risks and help inform the suitability of the above proposal and any suggested changes in the existing instrument. Without proper contamination assessment and management, the EPA flags its concern on potential exposure risk of users and recommends that DPIE (Planning) address these contamination issues in the foreshore area of the Parramatta River in the current planning of the Leeds Street Precinct.

The EPA continues to recommend that an NSW EPA accredited Site Auditor be engaged to provide DPIE (Planning) increased certainty on the appropriateness of the areas for the proposed use. Engagement of the Site Auditor early in the process of rezoning will also help ensure that contamination is managed appropriately.

Also, the EPA would like to highlight that there are benefits from taking the broadest precinct approach to addressing site contamination as this will prevent any remediated areas from being re-contaminated by ongoing site works or from adjacent contamination. Holistic consideration of contaminated land management/ remediation options can also lead to benefits in terms of remediation costs, improved planning and layout of facilities and services, efficient ongoing management of any residual contamination, and preventing risks to human health and the environment.

The EPA will continue to engage with DPIE (Planning) so that contamination is investigated, remediated, and managed appropriately during the proposed land use changes and to ensure the processes outlined in State Environmental Planning Policy 55 - Remediation of Land are followed to protect human health and the environment.



File ref. no: FRN12/2811-2-008
Doc. ref. no: D20/75783
Contact: Shane Kempnich

Attention: Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

21 September 2020

Re: Draft Rhodes Precinct Place Strategy

I refer to the exhibition of the Draft Rhodes Precinct Place Strategy, which aims to reinforce the role of Rhodes as a strategic centre in the *Eastern City District Plan (2018)*. It is understood this will entail changes to the planning controls (including landuse zones and building heights) which will encourage significant urban renewal supported by a range of existing and future infrastructure and services.

I understand there have been discussions held with Mr Brendan Metcalfe, A/ Director Eastern and South Districts, and so this will formalise the issues discussed.

FRNSW currently operates a fire station at 438 Concord Rd, Rhodes. The history and nature of the site pose some unique circumstances for FRNSW.

The land on which the station sits was for many years leased from the McIlwaine family, who actually started the brigade back in the 1920's, and they have a long and distinguished association with both the Rhodes area and FRNSW (or the NSW Fire Brigades as it was known previously). That land, along with surrounding sites, is now owned by a development company known as Ecove.

As FRNSW had no direct control over the fire station land, the ability to make long-term service delivery and investment decisions were complicated, hence FRNSW could not necessarily identify or make commitments to infrastructure improvements on the site.

Since taking control of the land, Ecove have held a number of discussions with FRNSW around maintaining a presence in Rhodes, and essentially looking at opportunities and mechanisms to provide for a replacement fire station within their proposed redevelopment at little to no cost to FRNSW.

Fire and Rescue NSW

Headquarters
1 Amarina Avenue, Greenacre

Locked Mail Bag 12,
Greenacre NSW 2190

T 02 9265 2999

www.fire.nsw.gov.au

Funding of a new fire station outright could pose difficulties for FRNSW to achieve, not only because of the difficult fiscal environment post-COVID, but the timing of that in order to be able sync with the timing of the proposed developments.

Should FRNSW have to look for a new site outside of the current opportunities, there is significant doubt that an appropriate site could be secured given the nature of the land holdings and the operational and location needs of the service.

From that perspective, Rhodes provides a strategic location for FRNSW's future service delivery, having regards to not only the development proposed around the peninsular itself, but the surrounding areas like Wentworth Point, Olympic Park and Meadowbank. FRNSW has also recently gained approval to relocate the Ryde fire station (which is the closest current station to the north) from Blaxland Rd to North Ryde. This makes it even more of an imperative to ensure that service coverage is maintained across this area.

FRNSW is therefore requesting your Department to consider the potential opportunities for Ecove to provide FRNSW with a new fire station at Rhodes, as a part of its proposed development and infrastructure contributions requirements, which will perform a critical role in the protection and safety of the surrounding communities.

If you have any queries, please do not hesitate to contact Mr Shane Kempnich, Principal Planning Officer for FRNSW, on 0427 881 488.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paul McGuiggan', with a stylized flourish underneath.

Paul McGuiggan AFSM
Assistant Commissioner
Metropolitan Operations

Your Ref: DOC20/733682

14 October 2020

Mr Brett Whitworth
Deputy Secretary, Planning & Design
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

Cc: Mr Malcolm McDonald

Dear Mr Whitworth,

RE: Rhodes Draft Precinct Plan - Selection of Preferred School Site and Exhibition Confirmation

I refer to your letter dated 24 April 2020 to Mr Steve Agnew in relation to the selection of a preferred school site in the Rhodes Draft Precinct Plan and subsequent meetings and discussions with the School Infrastructure NSW (SINSW) team.

We note that discussion relating to the selection of a preferred school site is ongoing, and the Department of Education (Department) is mindful of Department of Planning, Industry & Environment's (DPIE) current exhibition of Rhodes East master plans. The Department is continuing to work expeditiously to obtain all information necessary to make an informed selection of a preferred school site that meets its requirements.

The Department substantially agrees that the location of the Option 1 site (see **TAB A**) offers various positive attributes. However as advised in recent meetings between Mr Agnew and your representatives, the school site is required to be a minimum area of 1.5ha and to be delivered under a VPA as part of this Planning Proposal. We note that the site initially offered was 1.1ha and that both teams have identified possible solutions to achieve the 1.5ha required.

These solutions could include:

- Removal of the proposed road to the south of the school. We understand that this is still subject to review by DPIE's traffic consultants. However, we would prefer vehicular access be removed and would support this connection being remodelled as a pedestrian cycle link in lieu of the road.
- Potential shared use of facilities within the school for community purposes such as open space, libraries, or community halls to be used by the incoming community, outside of school hours. This may free up funds within the precinct to assist in securing the land required to meet the Department's needs.
- Whilst not preferred, consideration of the investigation into the potential to locate some of the Department's facilities off the Option 1 site on adjacent lands such as staff parking or other non-student related activities.

If further acquisition is required to meet SINSW criteria for a new public school, then the cost of this acquisition should not be borne by the Department of Education..

We also understand that DPIE had agreed to allow SINSW to review plans prior to exhibition to confirm that there are no elements of the proposal that would commit the Department to a non-conforming site. This will continue to allow both DPIE and SINSW to work together during the exhibition to find an optimal and joint outcome. I understand there is a joint workshop for this purpose in the planning.

The resolution of the above is typically dealt with prior to Exhibition. However, to support DPIE's program, and based on the above conditions being satisfied, SINSW supports the Exhibition of the Rhodes East Precinct Plan in the context of the advice we have previously provided and summarised in this letter.

Should you wish to discuss this matter or require additional information, please call Steven Agnew on 0413 038 175 or email steven.agnew@det.nsw.edu.au

Yours sincerely

Martin Karm
A/ Chief Executive, School Infrastructure NSW,
School Infrastructure NSW



TAB A



SINSW Site Options Analysis – Option 1



DIV20/107005

21 September 2020

Attention: Mr Brendan Metcalfe

Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Metcalfe

Thank you for the opportunity to comment on the draft Rhodes Place Strategy. The Office congratulates the Department of Planning, Industry and Environment on the thoroughness of the draft Strategy.

While the Office of Sport realises that Rhodes is proposed to be predominantly a *thriving strategic centre where people can live, work and play*, we have provided a few comments and suggestions that may add to the overall 'play' and liveability aspects of the precinct by the local community, without detriment to the strategic intent for Rhodes (refer to attachment).

If you would like to discuss any of our comments further please contact Fiona MacColl, Principal Advisor, Infrastructure Strategy, Planning and Delivery via phone: (02) 8754 7991 or by email: fiona.maccoll@sport.nsw.gov.au.

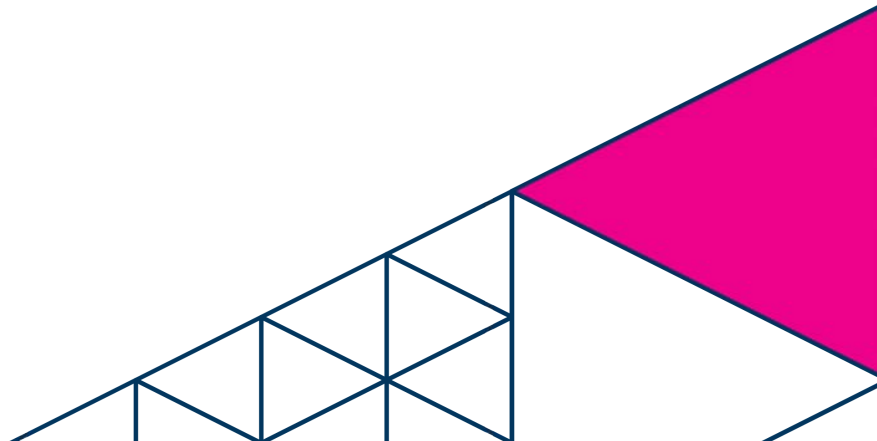
Yours sincerely



Karen Jones
Chief Executive



OFFICE OF SPORT

✉ Locked Bag 1422, Silverwater NSW 2128
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ABN 31 321 190 047



	Draft Rhodes Place Strategy	
Page	DPIE proposal	Office of Sport Comments
4	2. Prioritise Active Transport – Design integrated transport services and experiences that prioritise walking, cycling and the use of public transport.	The Office agrees with this proposal, however would suggest that these active transport links also link to and activate the school and sporting facilities with the precinct e.g. DSA Dragon Boat Club and 1st Yaralla Sea Scout Group.
4	3. Public Access to the Waterfront – Provide new public access to the Parramatta River foreshore	The Office agrees with this proposal, and would suggest that soft launching of non-motorised watercraft be enabled along the Parramatta River foreshore, not only at Urhs Point.
4	5. Great Public Spaces – Provide high quality public spaces prioritised for pedestrians that are safe for gathering and socialising.	<p>The provision of high quality public spaces should include active recreation opportunities both within the existing and proposed parks within the precinct e.g. by including nature play, community gardens, non-motorised watercraft storage and launch areas, spaces for Yoga / Pilates in the park.</p> <p>The Office notes that universal access of public spaces was not discussed in the draft Strategy, however this is an essential part of planning and design of public spaces – all public spaces should be universally accessible.</p>
5	<p>Executive summary</p> <p>a new primary school for up to 1,000 students</p>	<p>The Office works closely with School Infrastructure NSW (SINSW) on planning for sporting facilities on school sites. We are available to work with DPIE and SINSW to ensure that the new school has the appropriate active recreation and sporting opportunities for children at the school.</p> <p>Based on our internal research, we would suggest that the new school could include an indoor centre with multi-use courts for both community and school use.</p>
17	<p>1. Design open space for amenity</p> <p>a. Existing and proposed open space should be designed for amenity rather than relying on interventions, improvements and/ or retrofits that compromise the intent or quality of the space.</p>	<p>As part of the open space amenity, the Office recommends that some upgrades to the existing facilities of the DSA Dragon Boat Club and the 1st Yaralla Sea Scout Group be included, either via Voluntary Planning Agreements or under section 7.11 contributions. These existing community groups will provide local opportunities to the residents and will need larger / updated premises to accommodate the increasing patronage from the increased population in the area.</p> <p>This open space provides an opportunity to include First Nations cultural heritage and universal access.</p>

17	<p>2. Pedestrian experience</p> <p>a. Prioritise the pedestrian experience above all other modes of transport.</p>	The Office supports this proposal, however would suggest that cycle paths connect social infrastructure and public open spaces within the precinct and beyond and also connect with existing and proposed future active transport routes. There should also be ample end of trip facilities at the social infrastructure destinations, public transport hubs and public open space destinations.
18	<p>6. Celebration of new open space on the Parramatta River</p> <p>New open space should celebrate the peninsula location and amenity of Parramatta River. This should be considered through internal and external views, proximity to the waterfront and support of the urbanity and open space criteria</p>	One way of celebrating the Parramatta River would be to include soft launching areas along the foreshore for non-motorised watercraft to enable their use along the Parramatta River.
18	<p>10. Character Areas defined by built form and public spaces</p> <p>Promote fine grain-built form and public realm variances between character areas (sub precincts) whilst remaining consistent with the Rhodes vision.</p>	Character areas could be defined by the inclusion of active recreation opportunities within both the existing and the proposed public open spaces. These active recreation facilities would enliven the public open spaces and encourage people to use the facilities to create community cohesion, better health outcomes and a 'vibe' within the precinct.
21	<p>5. A model for environmental and sustainable development – improved resilient building controls to promote energy and water savings in the precinct</p> <p>design excellence controls to ensure development in Rhodes delivers the highest standard of architectural and urban design.</p>	<p>The grey water collection from developments could be used to irrigate the public open space areas to ensure their resilience. Water sensitive urban design along the streets could include rain gardens that also water the street trees to ensure their health and resilience in an urban environment.</p> <p>Stormwater harvesting could also be investigated for a source of water for the public open space irrigation needs.</p>
42, 43	<p>These new pedestrian and cycle paths will provide an important connection and will contribute to the Green Grid outlined in the Eastern City District Plan.</p> <p>Greenery – 25% green view index and canopy cover through canopy trees along the foreshore and in the foreshore park will mean at least 25% of what is seen at street level is green. It also includes landscaping on future development sites and green elements on buildings such as green roofs or walls.</p>	<p>The existing public open spaces within Rhodes have limited tree planting. There is ample need for trees within this location. The Office would suggest a precinct master plan indicating the quantity of trees, types and sizes of trees (at planting and at maturity).</p> <p>The expressed '25% green view index' could be extended to provide better shade, softening of developments at street level, habitat and even as a community food source if various trees with edible fruit, leaves and flowers were planted.</p>

43	 <p>Leeds Street open space 'edge' to Parramatta River</p> <p><small>Leeds Street foreshore artist impression. Render provided by Roberts Day. Department of Planning, Industry and Environment Draft Rhodes Place Strategy 43</small></p>	 <p>Barangaroo's more environmentally friendly and interesting social edge is recommended</p>
44	Potential foreshore public art trail including opportunities to celebrate indigenous and intercultural heritage	The Designing with Country strategy has a variety of ways that celebration of our First Nations people could be achieved, especially as the Parramatta River is such an important part of the Wangal people's lives.
RHODES PRECINCT - Explanation of Intended Effect		
11	Summary of provisions for design excellence: School site playing fields	The Office could not find any location / indication for the proposed school playing fields. We are available to work with DPIE and SINSW on opportunities for sporting facilities on the school site.
16	Proposed Amendments to SREP 2005– Clause 18 Development Control in the Waterway River swimming pool at McIlwaine Park	The Office understands that this area is one of the most polluted areas in Sydney from the former heavy industrial activities that took place – both the land and the river bed are contaminated with dioxins, heavy metals etc. There would need to be significant remediation works for a river swimming pool..
	Leeds Street Strategic Foreshore – master planning process	As per comments on 42 and 43.



Our ref: DOC20/738983

Mr Brendan Metcalfe
Acting Director Eastern and South Districts
Eastern Harbour City
Department of Planning, Industry and Environment
brendan.metcalfe@planning.nsw.gov.au

Attention: Ms Charlene Nelson, Acting Manager, Place and Infrastructure
rhodesprecinct@planning.nsw.gov.au

Draft Rhodes Place Strategy

Dear Mr Metcalfe

Thank you for the opportunity to comment on the draft Rhodes Place Strategy prepared by the Department of Planning, Industry and Environment in collaboration with City of Canada Bay Council and other State agencies.

We previously provided advice on this matter on 15 December 2017 (attached for your information). In this advice we noted:

- that the draft Precinct area did not contain any State Heritage Register listed items
- there were multiple Local heritage items in the draft Precinct area, which were proposed to be retained in situ, and
- that Council should be satisfied that the proposed controls for the area amounted to a good heritage planning outcome.

We have reviewed the draft Rhodes Place Strategy, the accompanying Explanation of Intended Effect and Urban Design Report, and our previous advice remains unchanged.

If you have any questions regarding this matter please contact James Sellwood, Senior Heritage Programs Officer, Heritage Programs at Heritage NSW by phone on 02 9274 6354 or via email at james.sellwood@environment.nsw.gov.au.

Yours sincerely

Rochelle Johnston
Acting Director, Heritage Strategy and Policy
Heritage NSW
As delegate of the Heritage Council of NSW

13 October 2020

Attachment 1 – Previous Heritage NSW Response



Level 6, 10 Valentine Avenue
Parramatta NSW 2150
Locked Bag 5020
Parramatta NSW 2124
DX 8225 PARRAMATTA

Telephone: 61 2 9873 8500
Facsimile: 61 2 9873 8599
heritagemailbox@environment.nsw.gov.au
www.heritage.nsw.gov.au

File No: SF 17/55939
Ref No: DOC 17/553013

Ms Sarah Koshy
Director
Sydney Central Urban Renewal
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

By email: Jennifer.Gordon@planning.nsw.gov.au

Dear Ms Koshy

Rhodes East Draft Precinct Plan

I refer to your letter of 8 November 2017 about the abovementioned draft precinct plan to revitalise Rhodes East. I understand that the draft plan looks at opportunities to build on the local character and heritage of the area to create a vibrant place to live and work.

It is noted that the documents exhibited with the *Rhodes East Draft Precinct Plan* includes *Heritage Assessment* that has informed the draft plan. The study area does not contain any items of State significance listed in the State Heritage Register (SHR). However, multiple items of Local significance listed within the 'Schedule 5 Environmental heritage' of *Canada Bay LEP 2013* are located within the study area. These include, nine early to mid-20th century houses, two community and one light industrial buildings, two small local parks, tree lined streets and one large waterfront reserve - McIlwaine Park,

The vision for Rhodes East, as stated in the draft plan is to build upon the existing character and heritage of the area. Based on the recommendations contained within the *Heritage Assessment*, the draft plan proposes the heritage items to be retained *in situ*, adequately protected by specific design controls. Given that the items are of local significance, the Canada Bay Council should be satisfied that the proposed controls in relation to the local items amount to a good heritage planning outcome.

If you have any questions regarding the above matter please contact Vibha Upadhyay, Heritage Programs Officer, Statewide Programs at the Heritage Division, Office of the Environment and Heritage by telephone on 02 9873 8587 or email at vibha.upadhyay@environment.nsw.gov.au.

Yours sincerely

Rochelle Johnston
Manager Statewide Programs
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council
15 December 2017

From: [REDACTED]
Sent: Wednesday, 9 September 2020 4:27 PM
To: DPIE PDPS Rhodes Precinct Mailbox
Subject: FW: Webform submission from: Draft Rhodes Precinct Place Strategy

Categories: Green category, Blue category

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Wednesday, 9 September 2020 3:19 PM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Rhodes Precinct Place Strategy

Submitted on Wed, 09/09/2020 - 15:18
Submitted by: Anonymous
Submitted values are:
Submission Type: I am submitting on behalf of my organisation
First Name: Peter
Last Name: Bleasdale
Name Withheld: No
Email: peter.bleasdale@syd.com.au
Suburb/Town & Postcode: Mascot 2020
Submission file: [webform_submission:values:submission_file]
Submission: The Area known as Rhodes Place lies outside Sydney Airport's Obstacle Limitation Surface (OLS) and is therefore not an issue for Sydney Airport. Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations. Sydney Airport advises that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct.

URL: <https://pp.planningportal.nsw.gov.au/Rhodes>



Draft Rhodes Place Strategy

Leeds Street and Cavell Ave Precincts

Thank you for allowing us to provide feedback.

We are making this submission on behalf of the Dragon Sports Association (DSA) Incorporated. DSA is a dragon boat racing club located at Uhrs Point Reserve, Rhodes. Established in 1983, DSA is one of Australia's founding clubs and has been active in local, NSW, Australian and World Championship Regatta events. Over the last 37 years, the Club has continued to grow and each year has around 70+ members, consisting of male and female paddlers of all ages (11-75+), sizes and levels of fitness.

Waterfront access

Waterfront access is paramount to DSA. We currently lease part of Uhrs Point Reserve from Canada Bay Council. There is a Passive Launch Facility in the making and we are very excited as this will provide significant improvements to our member's safety and access to the water.

The plan for the Leeds Street Precinct does not encroach on the Uhrs Point Reserve so we have no issue with the planning.

The proposed new ferry wharf will be further into the river than the passive launch facility and about 200m apart. DSA is used to the ferry wash with the nearby Meadowbank ferry wharf and we are vigilant with our safety around embarking and disembarking particularly the timing of launching and proximity of the boats to the sea wall.

Storage for our boats

Our lease allows the storage of our boats on the Uhrs Point Reserve. As the plan for the Leeds Street Precinct does not encroach on the Uhrs Point Reserve we have no issue with the planning.

Parking

Some of our members live in Rhodes and they walk or ride to training. However, most of our members are from nearby suburbs, some members live 30 to 60 minutes drive away and need to drive to the training sessions as public transport is not a viable option. We train 3 to 4 times per week. Our members park in Uhrs Point Reserve and Leeds St car park at no charge. This equates to around 40 to 50 cars per training session. Our training times are Tuesday and Thursday nights (6.30pm to 9.30pm) as well as Saturday and Sunday mornings (7.00am to 11.00am)

Cavell Ave Precinct appears to have new buildings and a through-site link where the current Leeds St car park is located. Also, it is unclear if the grassed area above the Leeds St car park on Concord Road will remain.

The Leeds St Precinct has provision for an underground public car park. There could be an option for our members to use this, however, all our training sessions would be in competition with restaurant goers for dinners and brunches. There would also be a concern for our members if this parking was to be paid for as that would significantly impact the cost for our members to access training.



In addition to our normal member's training sessions, DSA also conducts a lot of training for corporate and community teams for Lunar New Year Dragon Boat races at Darling Harbour. This year we trained 6 teams, 3+ times over the January / February period. This equates to approximately 120 members of the public using the facilities with an extra 40 at any one training session, all needing parking.

DSA also conducts team building events throughout the year using the dragon boats. These have ranged in participant numbers from 20 to 60, all requiring parking.

Please contact us if you would like further information or clarity on our submission.

Regards,

George Dimech
Operations Director
operations@dsadragon.org
0413 019 546

Corina Wotherspoon
President
President@dsadragon.org
0434 490 005

Dragon Sports Association Inc
Uhrs Point Reserve
Concord Rd
Rhodes



Canada Bay Bicycle User Group Inc
Incorporated in NSW under the
Associations Incorporation Act 2009 as INC9882364.
Affiliated with Bicycle NSW Inc.
E-mail - secretary@baybug.org.au
Website: - www.baybug.org.au
Correspondence to:
The Secretary
Geoff Ashton
52 landra St
Concord West NSW 2138 Australia
Mobile: 0407006874

9 October 2020

The Secretary
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

Uploaded to:

<https://www.Strategyningportal.nsw.gov.au/Rhodes>

cc: by email to: General Manager City of Canada Bay: council@canadabay.nsw.gov.au

Pages (inc this one): [10]

[Submission on the revised Rhodes Draft Precinct Place Strategy \(the “Strategy”\) and Urban Design Report \(the “Report”\) August 2020 \(extracts copied October 2020\)](#)

This is a submission by Canada Bay Bicycle User Group (“BayBUG”) on behalf of all those who cycle in Canada Bay.

This submission has three parts:

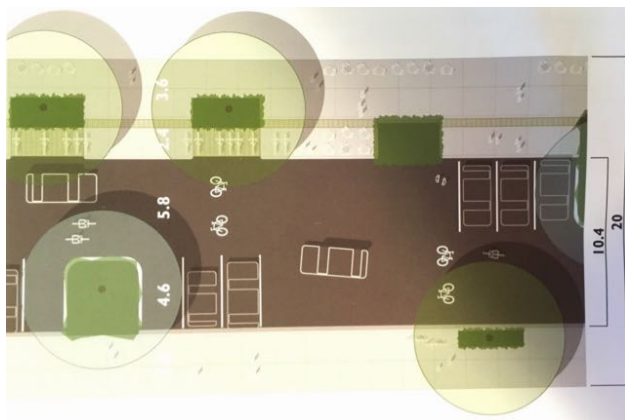
1. Summary of what needs to be done to achieve the Strategy’s desired cycling outcome – modal shift.
2. Underlying problems with the Strategy.
3. Comments on extracts from the Strategy and Report.

[1. Summary of what needs to be done in the Rhodes vicinity to achieve the Strategy’s desired cycling outcome – modal shift:](#)

- a) **Change longstanding regulatory constraints that make a good active transport outcome in Rhodes unlikely.** We refer in particular to the regulations that prevent cycling on footpaths and pedestrian crossings and limit possible speed limits to 10/40/50 km/h and the warrants that constrain the use of the 10/40 km/h limits. NSW laws should be brought into alignment with those of the bulk of Australian jurisdictions in the matter of use of footpaths by adult cyclists, NSW lower speed limits aligned to the European benchmarks 15/30 km/h and warrant

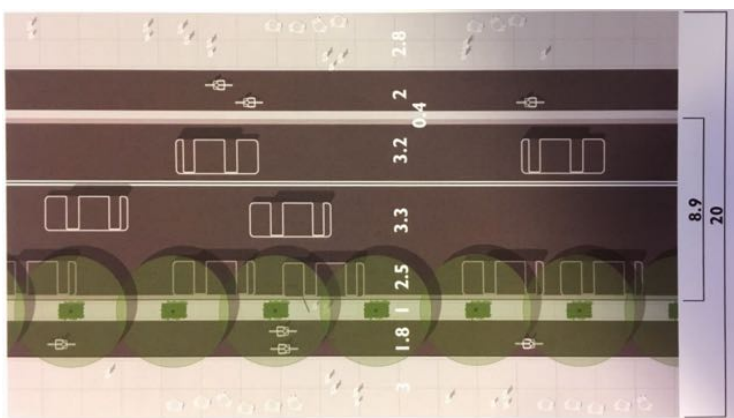
procedures relaxed so that all roads in Rhodes East can be zoned 15 or 30km/h. The suggestion that Cavell may be zoned 30km/h is not enough.

A 15km/h pedestrian orientated area (like the “destination” (Leeds) and “Local” (Averill and new streets) could look like¹:

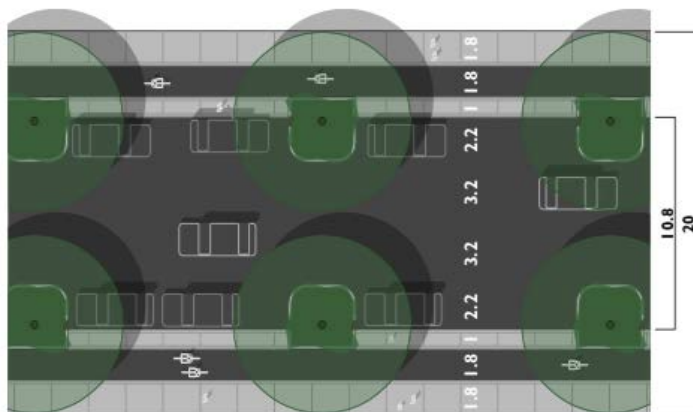


- b) Put separated one way pair bike lanes in all 30km/h roads and 15km/h areas where high bicycle volumes can be expected. In need take away on street vehicle parking.

A 30km/h road (like the “Commuter” (Blaxland) and “Spine” (Cavell) streets could like:



Or:

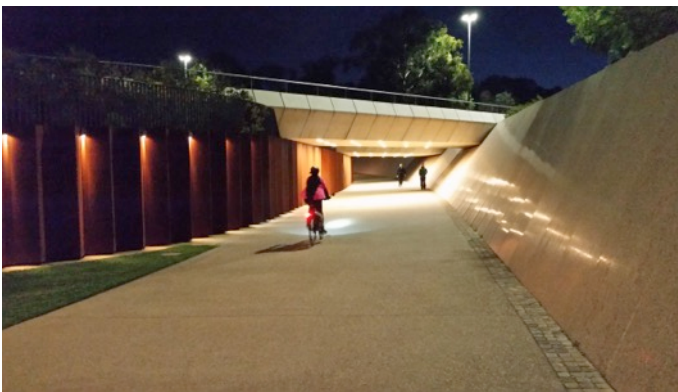


¹ Diagrams copied from pages 33, 39 and 25 Mike Harris, “Reconfiguring Sydney Streets – Copenhagen case studies and Sydney adaptations”, published by Sustainable Transport Consultants Pty Ltd, 2016.

- c) Ensure that the “Station Gateway” has rideable ramps to Gauthorpe St and/or Walker St and to Blaxland Rd and Mcllwaine Park.
- d) Ensure that there is a second crossing of the railway north of the “Station Gateway” and south of Leeds St that is either ramped so as to be rideable at least by cyclists or is accomplished by an underpass that may be at least wheeled through by cyclists. Like the cheap one at Station St Concord West:



Though better would be like they do it in Canberra:



- e) Improve Llewellyn Street and the shared path through Mcllwaine Park next to Concord Road and through Rhodes Park so that cyclists have separated, preferably one way pair, bike lanes.
- f) **In Rhodes (west) retrofit Leeds Street (including the railway underpass), Walker Street, Nina Gray Ave, Gauthorpe Street, Shoreline Drive, Rider Boulevard and Mary Street with one way pair bike lanes, using Danish design principles as illustrated above. See footnote 1 for the complete reference.**
- g) **On Bennelong Bridge between Rhodes (west) and Wentworth Point change the Transit Way to a conventional Bus Lane that may be used by cyclists, or reconfigure so that cyclists have separated, preferably one way pair, bike lanes.** The shared path is proving to be excessively congested while the (bus only) roadway is mostly completely devoid of traffic. Cyclists could safely be on the roadway.
- h) **Under the southern end of Ryde Bridge widen the current shared path and create a properly formed two way bike lane to connect from Ryde Bridge’s east side shared path to the (proposed in this submission) one way pair bike lanes on Blaxland Rd and Leeds St (west) and the Rhodes (west) foreshore.**
- i) **Ensure that the Leeds Street Foreshore precinct includes cycleable paving that at least**

mirrors and connects with that provided on the Rhodes (west) foreshore.

- j) **Include in the Strategy specific measurable objectives to achieve modal shift and designate responsibility to measure performance of planned actions and to update what doesn't work.**
- k) **Ensure the planned cycle parking works for Rhodes cyclists.** Developers must not be allowed to satisfy the minimum 2 bike spaces for each unit + visitor parking requirement by installing banks of U Bars outside of buildings or in car parks. Bike parking needs to be additional to adequate general storage and must be located convenient to residences and be theft and vandal proof. Cycle parking capacity at Rhodes station needs to tripled.

2. General comments – underlying problems with the Strategy:

- a) **The Strategy has no references to its role in fulfilling council/state/national active transport plans and only a few to the active transport aspects of the Greater Sydney Commission Eastern City District Strategy.** We guess that the lack of reference is as likely to be a consequence of the lack of binding significance and relevance of those plans as it is a consequence of the deficiency of the Strategy, but a lack never the less. Without a useful 20 year NSW and Sydney Strategy of what and how to develop adequate cycling routes that connect to Rhodes from the north, south, east and west, BayBUG does not see how there can there be effective active transport planning for Rhodes. Such plans should be developed, and referenced in the Strategy, before the Strategy is implemented. It is unlikely that many of the 8,000+ new residents will be interested in cycling to Ryde or Parramatta or Strathfield or Concord or the City of Sydney without the creation of a network of separated cycleways designed for 20km/h+ travel and for cyclists to safely pass each other. Without a proper network outside of Rhodes the Strategy's hope that "active transport" will be embraced by the 8,000+ new residents to such an extent that they won't want to drive cars or crowd onto Rhodes station is fanciful.
- b) **The Strategy assumes without challenge longstanding regulatory constraints that make a good active transport outcome in Rhodes unlikely.** We refer in particular to the regulations that prevent cycling on footpaths and pedestrian crossings and limit possible speed limits to 10/40/50 km/h and the warrants that constrain the use of the 10/40 km/h limits. NSW laws should be brought into alignment with those of the bulk of Australian jurisdictions in the matter of use of footpaths by adult cyclists, NSW lower speed limits aligned to the European benchmarks 15/30 km/h and warrant procedures relaxed so that the whole of Rhodes East can be zoned 15 or 30km/h, before the Strategy is implemented. Making Cavell Ave 30km/h is not enough. The suggestion in the Design Report that there not be pedestrian crossings in 50km/h or even 30km/h road environment is ridiculous.
- c) **The Strategy's assumptions about existing cyclist activity within and through the precinct and its adjoining areas are wrong, and are based on insufficient data.** The subject 2020 Strategy does not articulate its assumptions. They are vaguely indicated in Figure 148 of the 2020 Report – "CYCLE AND PEDESTRIAN NETWORKS" at page 151 and Figure 32 page 32. In this respect BayBUG assumes that it relies on the September 2017 Planning Report. Referring to pages 13 and 14 and the Figure 6 map in the September 2017 Planning Report:
 - A) The status of the map as representing 2017 is doubtful, as it shows non existent crossings of the railway south of Leeds and opposite Gauthorpe. That error is perpetuated in Figure 148 of the 2020 Report. And because:

-
- B) Numbers of cycle routes are missing. Cyclists frequently use Mary Street to cross Concord Road to access Blaxland Road, the full length of Walker Street, Rider Boulevard and Shoreline Drive and cross Ryde Bridge before passing under it to access Leeds Street. Gauthorpe is an important cycling link to Bennelong Bridge. The route north on Blaxland Rd crossing Leeds and on to the foreshore paths.
 - C) No information relevant to prioritisation. The map does not show what routes take the heaviest volume of what types (broadly, commuter and recreational) riders, nor what their destinations are.
 - D) The “heaviest volume” question might be resolved by referring to Strava heat maps. Two recent printouts of the simplest version are attached to this submission, one focussed on the Rhodes Peninsula and the other out to about 5km². Appropriately skilled consultants can interrogate Strava data to get more sophisticated maps. Destination data requires survey work.
 - E) That work should be done and the cycling aspects of the Strategy reconsidered before the Strategy is implemented.
 - F) But if one assumes that the cyclists of and passing through Rhodes East will have similar “desire lines” to those represented in the simple Strava data it is at least clear that they are travelling to and from areas far outside the Precinct, so if the Strategy is to succeed in getting people to do more cycling a lot of what needs to happen to promote change will be outside the precinct. That said, what is outside your door is also important. This submission strikes the compromise of advocating for improvements within 2km of the Rhodes East precinct that are in the City of Canada Bay.
- d) **The Strategy’s many suggestions that it is about changing modal share away from motor vehicles must be supported by measurable objectives and the allocation of responsibility for lack of performance.** Page 24 of the Appendix F (to the 2017 Rhodes East Draft Precinct Strategy) Traffic and Transport report suggested that there be modest mode share targets for walking to increase from 13% to 30% and other (including cycling) from 3% to 5%. In BayBUG’s view that suggestion lacks rigour. For example the effectiveness of plans to increase modal share should be tested regularly and if not successful supplemented. That is, planning authorities and private and public developers must take responsibility for getting the Strategy to work. But even the 2017 suggestion to have targets seems not to have been taken up in the 2020 Strategy.
 - e) **The Strategy has only a limited and confused concept of what part cycling can play in a desirable, liveable and attractive urban environment.** For example pages 12 – 14 of the Urban Design Report establish the Report’s principles. While we have no argument with making principle 2 “PRIORITISE THE PEDESTRIAN EXPERIENCE ABOVE ALL OTHER MODES OF TRANSPORT.” It is mystifying that the creation of cyclable streets is not a principle at all. It isn’t hard to do. And should not degrade the “pedestrian experience”.

² See attachment on last page

3. Comments on extracts from the Strategy and Report

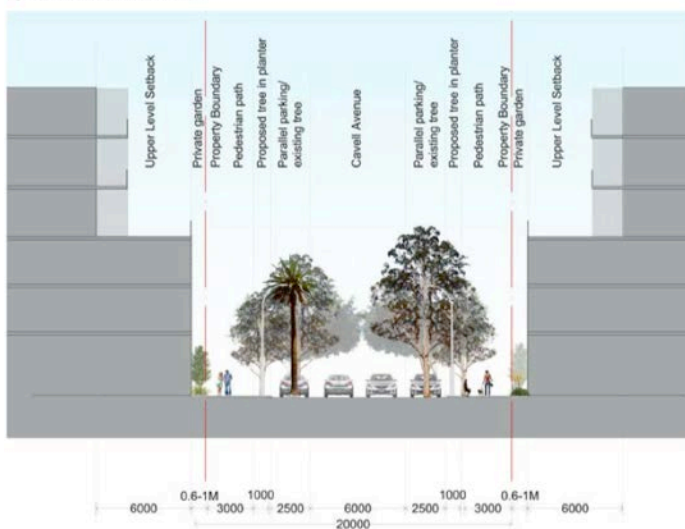
3.1 Why, in a development where we are keen to get more people cycling would we make the local streets look like this? (20 – 22m between building lines):



Figure 085. Cavell Avenue - Artists Impression

P79 Urban Design Report, artist's impression of Cavell Ave

Figure 187. Cavell Ave - Street Section



3.2 When we could make them safe for cyclists like this? (22.2m between building lines)



Frederiksborggade

Street profile	
Pedestrian	25%
Bicycle	21%
Buffer	9%
Car	45%

3.3 Or this? (38m between building lines):



Sønder Boulevard

Street profile
 Pedestrian 56%
 Bicycle 14%
 Car 30%

3.4 Or this side street - a 30km/h slow speed street? (16m between building lines):



Niels Ebbesens Vej

Street profile
 Pedestrian 37.5%
 Car/Bicycle 37.5%
 Parking/planting 25%

3.5 Comments on selected aspects of the Explanation of Intended Effect (EIE), Strategy and Report

Strategy page number	Strategy proposal	BayBUG comment
30	Station Gateway East – design criteria – [include] new public open space – deliver a 16-metre-wide ‘bridge’ linking east and west Rhodes including the station and McIlwaine Park, activating the bridge to create a plaza. The Station Bridge Plaza will provide critical enhanced connections to Rhodes West and will be a safer and more enjoyable pedestrian alternative to an at-grade access	<p>Cycling must be provided for in the station precinct and the new bridge must be ramped and able to be ridden by cyclists.</p> <p>The station is an important destination for cyclists and Walker and Gauthorpe are both important streets for cyclists - see the Strava heat map at the end of this submission, these design considerations ignore those facts. Apart from Strava look at the fully used cycle parking on the West of the station, which needs to be trebled, and the attempts by Council to make Walker Street</p>

Strategy page number	Strategy proposal	BayBUG comment
		<p>more attractive for higher speed cyclists to reduce pedestrian cyclist conflict on the foreshore paths, which are the only other route connecting the John Whitton bridge to the Bicentennial Park cycleways.</p>
5	<ul style="list-style-type: none"> • improved walking and cycling paths, through site links and access to existing public open space to improve permeability through the precinct to the public domain, waterfront, Rhodes Station and nearby employment areas such as Concord Hospital. 	<p>## This sounds good but is somewhere between vague and misleading.</p> <p>According to multiple references in the Strategy and Report the only street with any specific treatment for cyclists will be Blaxland Road, a treatment that will be very similar to what is already there.</p> <p>Pages 161 – 199 of the Report include cross sections of various street types. What is proposed are conventional streets with footpaths, gutters, road pavements and in Blaxland Rd a separated cycle path on its western side in place of the existing shared path. Leaving the reader with no idea what is being done to improve walking and cycling.</p> <p>The way to ensure that the things touted in the adjacent column happen is to create safety for pedestrians and cyclists by ensuring that enforceable speed limits and street design achieve vehicle (and cyclist) speeds in Primary Streets of 15km/h and in Secondary Streets of 30km/h. See: “Safe-Street Neighbourhoods: the role of lower speed limits” Dick van den Dool, Paul Tranter and Adrian Boss, <i>Journal of the Australian College of Road Safety</i> (pages 55- 63):</p> <p>http://acrs.org.au/wp-content/uploads/JACRS-AUG2017-Vol283.pdf</p> <p>Secondary streets should get one way pair separated cycleway treatment. See Mike Harris, “Reconfiguring Sydney Streets – Copenhagen case studies and Sydney adaptations”, published by Sustainable Transport Consultants Pty Ltd, 2016. See the examples of Copenhagen streets at 3.1, 3.1 and 3.3 of this submission.</p> <p>Which suggests that the Primary, pedestrian priority, 15km/h Streets should be the east – west ones and that Blaxland and Leeds and Cavell would be more for vehicle traffic, and so 30km/h</p>

Strategy page number	Strategy proposal	BayBUG comment
		streets.

Report page number	Report proposal	BayBUG comment
15	<p>“STREET CHARACTER HIERARCHY</p> <p>The principles of the Movement and Place Framework (TfNSW) have informed the Street Character Hierarchy. The primary aim is to integrate transport, urban design, landscape and place making to realise positive improvements to the public domain and to help facilitate a modal shift that will reduce private car reliance and use. The proposed street types generally reflect the intent, and support the land use, density and street function of the different Character Areas.”</p>	<p>See comment above on P 5 of the Strategy. The “initiatives” in the Strategy are insufficient to promote modal share change.</p> <p>Their inadequacy is only highlighted by the lack of provision for cycling on the vital cross railway connections.</p>

Yours faithfully

For Canada Bay Bicycle User Group Inc.
Geoff Ashton

Attachment – Strava heat map

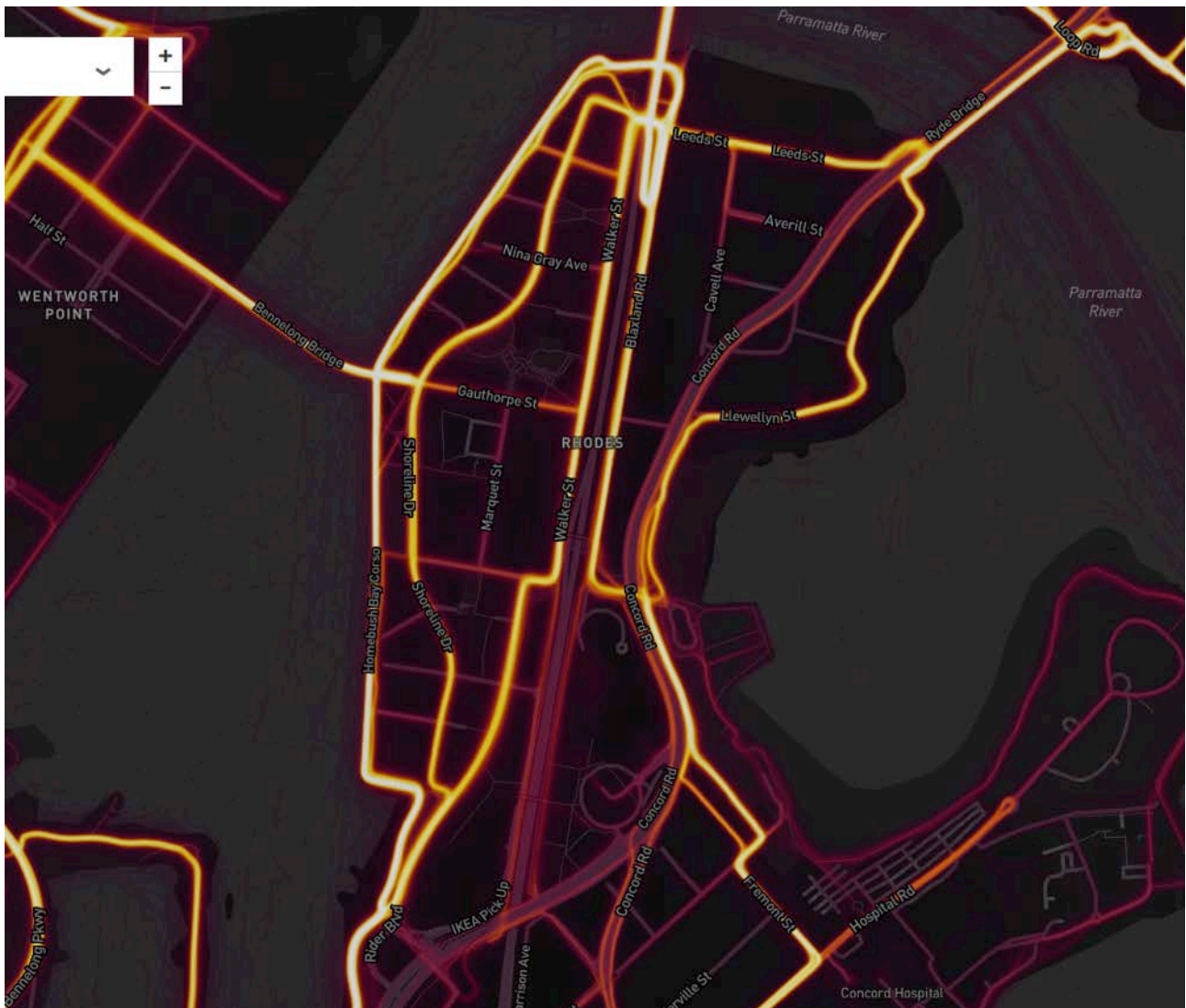
Strava heatmap, cycling, Rhodes 280219

The Global Heatmap

Athletes from around the world come here to discover new places to be active. Here's what you should know about the heatmap and the data it reflects:

- The heatmap shows 'heat' made by aggregated, public activities over the last two years.
- The heatmap is updated monthly.
- Activity that athletes mark as private is not visible.
- Athletes may opt out by updating their [privacy settings](#).
- Areas with very little activity may not show any 'heat.'

Visit the [Strava blog](#) to learn more or close this window to explore the heatmap.





9 October 2020

Attention: Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Paramatta NSW 2124

Submission to the Draft Rhodes Precinct Place Strategy

Thank you for the opportunity to provide a submission to the Department of Planning, Industry and Environment's (Department) Draft Rhodes Place Strategy (Strategy).

The purpose of this submission is to respond to the Draft Rhodes Precinct Place Strategy from City West Housing's (CWH) position on the exhibited documents, including key sections of particular impact to CWH and the affordable housing sector. The structure of this document is as follows:

- Section 1: Overarching position
- Section 2: Response to key sections
- Section 3: Concluding comments

The role of City West Housing

CWH is a not-for profit, Tier 1 registered community housing provider with an independent Board of Directors. It has been operating in the City of Sydney local government area for 26 years. The original intent behind the establishment of CWH was to ensure that as Ultimo and Pyrmont were revitalised in the 1990s, a diverse range of housing was still available at different price points for local residents and workers.

Today, CWH owns and manages close to 1000 affordable rental apartments built for the specific use of affordable housing into perpetuity. This supply houses around 1,700 residents in the City of Sydney. Demand for affordable housing continues to exceed available and proposed supply.

The need for affordable housing is not a short-term need. Now more than ever people need long term stable and affordable homes. CWH has a reputation for delivering high quality developments that are sustainable, energy efficient and provide excellent amenity for residents and is committed to serving the local communities in which it operates.

1. Overarching position

CWH supports the Department's master plan approach for the Rhodes precinct that prioritises active transport, integrated infrastructure and density with a human scale. CWH supports the recognition of affordable housing as critical infrastructure as a foundational policy statement.

CWH strongly supports the Department's recognition of affordable housing as one of the top objectives of the Strategy listed as Objective 4. Well recognised policy position on the importance of affordable housing delivery is integral to support Sydney's ongoing social and economic sustainability.

The documents on exhibition define affordable housing in differing ways. In some instances affordable housing is referring to housing for very low, low and moderate income households, while other times very low households are excluded from the definition. CWH supports a definition that includes very low, low and moderate income households.

The Strategy recommends a maximum of 5% affordable housing to be provided. CWH recommends that minimum controls for affordable housing are set rather than maximums given the strong underlying demand for affordable housing. Affordable housing is a critical piece of essential social infrastructure.

2. Response to key sections

Affordable housing

The draft Strategy highlights 5 big transformational changes for the peninsula including "Providing new homes, affordable housing and diversity of dwellings" including "up to 5% of all dwellings to be provided as affordable housing."

The affordable housing target suggested of up to 5% is below the threshold recommended by the NSW Government (Greater Sydney Commission's) Greater Sydney Region Plan and Eastern District Plan (for affordable housing to comprise 5-10% of new housing supply).

Canada Bay currently has an severe undersupply of social and affordable housing dwellings resulting in a large number of individuals either homeless or in housing stress.

The Canada Bay Local Housing Strategy September 2019 report by SGS Economics and Planning states the following facts regarding supply and demand of affordable housing in the Canada Bay LGA:

Housing Affordability

- 3,780 households experiencing rental stress, of which 2,224 are experiencing severe rental stress.
- 262 individuals in Canada Bay were identified as homeless.

Demand

- "In 2016, there was demand for 5,058 social and affordable housing dwellings within Canada Bay."
- Forecast demand between 2016 and 2026 is estimated to be between 630-890 dwellings depending on affordability worsening or improving.
- Forecast demand from 2026 to 2036 is estimated to be between 1,000 and 2,189 dwellings.

Supply

- Existing supply of social and affordable housing in the area is 1,187 dwellings.
- The report acknowledges that the supply of social and affordable housing may decrease when NRAS funding ends resulting in conversion of affordable dwellings to full market rental dwellings.

Based on 2016 data, Canada Bay had a deficit of 3,871 social and affordable dwellings. The deficit worsens over time as demand outstrips available supply.

The forecasted potential maximum affordable housing forecast of 213 dwellings in the Rhodes precinct falls significantly short of addressing the existing demand, not even providing housing for the cohort identified as homeless in 2016.

CWH Recommendations on affordable housing:

1. With the demand for affordable housing exponentially increasing, CWH recommends that a minimum requirement of 10% for affordable housing is required, with no cap on how much can be delivered.
2. The affordable housing percentage required should be calculated based on the entire development area, not just the uplift amount.
3. Affordable housing should be provided in standalone fit for purpose buildings.
4. Affordable housing should be in perpetuity.

BASIX targets and sustainability

The Strategy refers to providing bonus floorspace ratio if additional BASIX targets are achieved. The bonus is represented as a percentage, is this correct or is the bonus intended to be an additional 0.5:1.

Unit Mix

CWH has seen an increased demand for one-bedroom dwellings as household sizes decreases and recommend that a sufficient percentage of one-bedroom dwellings are provided. Ideally affordable housing should be delivered in a fit for purpose building which enables operational efficiencies to be realised which reduces the costs of providing affordable housing.

Concluding comments

CWH strongly support the Department's position on affordable housing delivery as an essential infrastructure to support sustainable development and growth of the region. As established in the documents currently on exhibition, the area has an underlying strong demand for affordable housing and an opportunity to address this demand within the Rhodes precinct.

In response to the draft documents currently on exhibition as part of the Department's Draft Rhodes Place Strategy, CWH:

- Strongly supports a minimum affordable housing requirement of 10% of all development in perpetuity.
- Supports a definition of affordable housing to include very low, low and moderate income households.
- Supports the recognition of affordable housing as critical infrastructure, as an important policy statement.

Kind Regards,



Lisa Sorrentino

Head of Development

16 October 2020

A/Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Via email: brendan.metcalfe@planning.nsw.gov.au ; rhodesprecinct@planning.nsw.gov.au

Dear Brendan,

RE: UDIA NSW Submission on the Draft Rhodes Precinct Place Strategy

UDIA is pleased for the opportunity to make a submission to the Draft Rhodes Precinct Place Strategy (the Draft Strategy).

The Urban Development Institute of Australia (UDIA) NSW is the peak body representing the interests of the urban development industry in New South Wales. We represent over 500 member companies that are directly involved in the industry including developers, consultants (engineering, planning, legal, environmental, design) and local government, for the goal of Liveable, Affordable & Connected Smart Cities.

UDIA supports the Department's master plan approach for the Rhodes precinct where it prioritises active transport, integrated infrastructure and density with a human scale. UDIA supports the recognition of affordable housing as critical infrastructure as a foundational policy statement and one of the top objectives of the Strategy listed as Objective 4. UDIA NSW holds a well recognised policy position on the importance of liveable, affordable and connected cities for the benefit Sydney's ongoing social and economic sustainability.

UDIA believes the revitalisation of the eastern portion of the Rhodes Peninsula has the capacity to assist with Sydney's post-COVID economic recovery. However, the private sector investment needed to deliver this recovery will be dependent on the Precinct having the right level of development controls, together with sufficient flexibility to ensure feasibility of development. The UDIA is concerned about the overly prescriptive and restrictive development controls that, in the latest iteration of the draft Strategy, which are likely to render many sites unfeasible for redevelopment.

The Draft Plans recently exhibited do not appear to take into consideration or respond to major key issues raised by landowners during the landowners' consultation process. There were four clear primary objectives for the declaration of Rhodes as a Priority/Planned Precinct almost five years ago - to deliver **new jobs, housing, open space and upgraded infrastructure** in a Strategic Centre.

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NEW SOUTH WALES

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Despite this being the third time since 2017 that DPIE has exhibited plans for the Precinct, it is UDIA's view that if the Draft Plans were to be made in their current form, they would fail to deliver on all of these objectives.

The present Draft Plans will likely sterilise development and fail to deliver jobs, housing and infrastructure in the Precinct for the foreseeable future and, at worst, are a lost opportunity to provide density together with new open space near railway infrastructure, which is critical for the 30-Minute global city objectives set out in the Greater Sydney Regional Plan.

UDIA asks the Department to further consult with landowners to devise a plan for the Rhodes Precinct that is both feasible and achievable, and will deliver on the Government's original objectives.

Over the past 5 years, extensive consultation with the Rhodes community has highlighted key items of concern for the community include the following:

1. **Inadequate existing open space**, in particular, the need for new off leash dog parks, sports fields and cultural gardens;
2. **Insufficient parking** – the current and past parking controls have led to shortfalls in resident and visitor parking leading to increasing challenges in obtaining on-street parking;
3. **Need for larger units with views** – terrace houses are considered to be an unaffordable and inappropriate product for land in a Strategic Centre that is flanked on both sides by water views. Moreover, as identified in recent research by the Greater Sydney Commission, many people are increasingly working from home and there is a need to accommodate home office space;
4. **View loss** – residents obviously remain concerned about potential loss of views arising from new development, which can be managed equitably by strategic locations for new towers;
5. **Urgent need for a school** - over 1,000 school age children currently live in Rhodes without a local school; and
6. **Transport infrastructure upgrades** to deal with increased demands on transport infrastructure as a consequence of urban renewal.

Overly-prescriptive and excessive development controls

Contrary to the feedback from industry on previous draft plans for the Rhodes Precinct, the current draft Strategy still includes some of the overly-prescriptive controls such as the mandated maximum car parking rates and unit mix maximum or minimum percentage rates. We also believe it is unrealistic to prescribe City of Sydney Category A parking rates for a suburban strategic Centre with only one railway station.

This puts Rhodes in a position to have the tightest central Sydney CBD parking rates in a transport-rich environment served by multiple heavy rail stations, multiple Metro stations, multiple light rail stops and two major ferry terminals.

Further, the excessively small average dwelling size adopted – around 80sqm across all dwelling types – is inconsistent with the market and with the GSC post-COVID-19 guidelines ‘City-shaping for a COVID-19 Recovery’. The UDIA contends that provision of car parking and unit mix should be responsive to the needs of local market demographics.

Specific objection is raised to the proposed design excellence provisions of minimum tower separation of 40m for towers above 20 storeys and the sun access protection requirements. These provisions are excessive and will render some sites unfeasible for development. The UDIA **recommends** that tower separation and sun access controls respect the ADG and be considered as part of site specific, merit-based impact assessments and not mandated under the SEPP.

The Department proposes a 25% canopy cover target will apply to the precinct, and a 25% green view index, meaning 25% of what is seen at street level will be green. We are seeking greater clarity for these controls particularly in conjunction with the need for greater densities to realise effective use of the ground plane for open space. The Strategy proposes to apply ‘Missing Middle’ housing typologies, including Torrens Title terrace houses and townhouses, within a few hundred metres of the station.

Such land uses are inconsistent with market demand, are uneconomic and unaffordable because of the underlying land value, and will consume a disproportionate land area on the ground plane, preventing the creation of new open space throughout the community.

Feasibility implications of significant changes to earlier drafts

The UDIA is concerned by changes to the distribution of density across the precinct, from those proposed in the 2018 Rhodes Revised Precinct Plan, which were discussed with major land-owners in 2019. This unanticipated change in direction creates uncertainty for investors and, as a consequence, may impede the vision for Rhodes being realised by limiting and/or delaying the development of key sites and the subsequent delivery of local infrastructure – including new open space, a primary school and new community facilities, along with much needed new homes and employment opportunities.

We also acknowledge that the SIC plans will need to be made out clearly and upfront to provide certainty for developers to invest further in the economic development of the Rhodes precinct.

UDIA **recommends** further engagement with key landowners to ensure feasible development outcomes so that the revitalisation and potential of the Rhodes Peninsula can be realised.

Addressing affordability with industry support

Based on 2016 data, Canada Bay had a deficit of 3,871 social and affordable dwellings. The forecasted potential maximum affordable housing forecast of 213 dwellings in the Rhodes precinct falls short of addressing the existing demand, and providing housing for the cohort identified as homeless in 2016.

Recommendations on affordable housing:

1. Affordable housing should be provided in standalone fit-for-purpose buildings which enables operational efficiencies to be realised which reduces the costs of providing affordable housing;
2. Affordable housing should be in perpetuity. This is in line with UDIA NSW Housing Diversity SEPP EIE ([linked here](#));
3. Broadly, UDIA believes there should be some clearer strategy to create industry incentives around affordable housing, for example development concessions (such as density bonuses, etc), accelerated approval pathways, or partnerships with CHPs.

Clarification on housing typologies and demand assumptions

We believe DPIE has erred in the Strategy with the strong bias towards medium density as a very high level of medium-density /attached dwelling demand has not been identified. This has not been backed up by feasibility analysis and could result in reduced delivery if the developments are not feasible. We believe the assumptions are not aligned with industry expectations and feasibility models, particularly those related to the suggested 'high/low and 'missing middle' strategy.

The Census table below shows that two-thirds of Rhodes households in 2016 were family households, and that proportion has continued to rise since 2016, as the growing population has matured and moved into larger apartments.

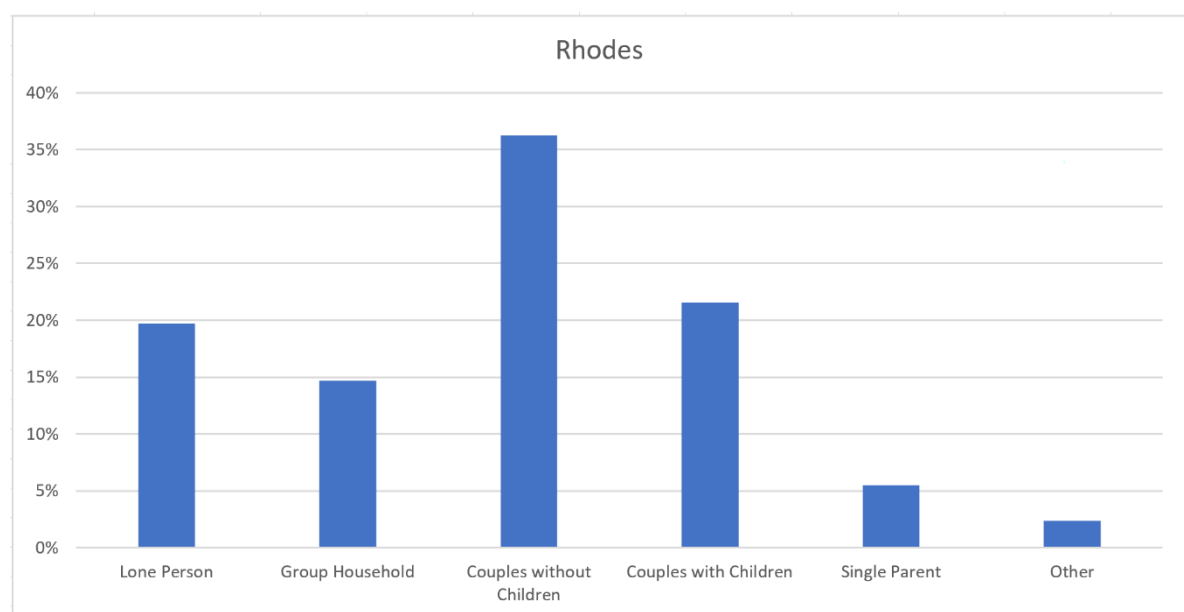


Figure 1: Source ABS 2016; UDIA NSW

Conclusion

UDIA is helping create Liveable, Affordable and Connected Smart Cities in line with the polycentric city model for Greater Sydney. We believe the Eastern City still has much to contribute to the growth of Sydney as a global, future city. But in order for industry to effectively and sustainably support the future housing supply of our cities, we recommend that our concerns are addressed.

Please contact Mr Kit Hale on 02 9262 1214 or khale@udiansw.com.au to arrange a meeting to discuss any further matter related to this submission.

Yours sincerely,

A handwritten signature in black ink, reading "Steve Mann". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Mann
Chief Executive Officer
UDIA NSW



Property Council of Australia
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Australia's property industry

Creating for Generations

9 October 2020

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Betts

Draft Rhodes Place Strategy and Explanation of Intended Effects

The Property Council of Australia welcomes the opportunity to provide the Department with comments on the draft Rhodes Place Strategy (the Strategy) and Explanation of Intended Effects (EIE).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developer of property across all asset classes. Please find attached our response to the exhibition of the Strategy and EIE.

As the NSW economy begins its recovery from the COVID-19 induced recession, it is vital that land use planning settings are tuned to deliver a strong economic and productive response. The Strategy will continue the existing urban renewal process already underway in the Rhodes Peninsula.

While we are generally supportive of the vision for the precinct, we are very concerned that the proposed changes to Canada Bay LEP 2013 will involve considerable additional costs to the supply of housing, including local and State infrastructure contributions, affordable housing contributions, resilience development clause and design excellence competitions. Given the COVID-19 induced recession that is impacting the State's economy, we suggest deferral or a discount be applied to some of these new measures.

Should you have any questions regarding the content of this submission please contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Belinda Ngo".

Belinda Ngo
Acting NSW Executive Director
Property Council of Australia

Submission to the Department of Planning, Industry and Environment

Draft Rhodes Place Strategy and Explanation of Intended Effects

9 October 2020

1.0 Proposed Amendments

The EIE describes the proposed amendments to *Canada Bay Local Environmental Plan 2013*, which involves:

- Rezoning land in B1 Neighbourhood Centre, IN1 General Industrial, R2 Low Density Residential and R3 Medium Density Residential to B4 Mixed Use and R4 High Density Residential,
- Amending the height of building and floor space ratio standards,
- Introducing a Design Excellence clause,
- Introducing a minimum non-residential development for certain sites,
- Introducing a maximum lot size for certain sites,
- Amending the active street frontage clause and identifying additional active street frontages,
- Introducing affordable housing provisions,
- Providing maximum car parking rates and minimum bicycle parking rates,
- Introducing a resilient development clause,
- Introducing a requirement for diversity of apartment sizes,
- Applying a satisfactory arrangements clause to the precinct,
- Adding water supply systems as permitted use across the precinct,
- Amending the land reserved for acquisition clause to identify new land acquisition and the relevant acquisition authority,
- Introducing Residential Flat Buildings as an Additional Permitted Use in the B4 Mixed Use zone in the Leeds Street character area,
- Introducing an exception to Floor Space Ratio (FSR) clause to allow FSR of any land dedicated for the purpose of a local road to be transferred to an adjacent site, and
- Introducing a capped yield for residential development based on infrastructure staging requirements.

Amendments are also proposed to *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*, which involve;

- Permitting public swimming pools with consent in W1 and W2 zones in Brays Bay, and
- Addressing the requirement to prepare a master plan for the Leeds Street Foreshore.

2.0 Key Issues

The following issues have been identified during our review of the proposal and are provided for your consideration:

2.1 Housing Affordability

The proposal seeks to introduce a clause into Canada Bay LEP 2013 that will require new development to contribute to the provision of affordable housing. The clause will authorise City of Canada Bay Council to levy an affordable housing contribution on future development in accordance with Council's affordable housing contribution scheme which is under development.

A 5% contribution rate will be applied to the Station Gateway East, Cavell Avenue and Leeds Street character areas. A 5% contribution rate will also apply to the Station Gateway West character area (except for sites at 4 Mary Street and 1-9 Marquet Street) where a 3.5% contribution rate will apply based on viability testing.

The Property Council acknowledges this scheme has been developed in accordance with the affordable rental housing targets established by the Greater Sydney Commission in the Eastern City District Plan and the guidelines issued by DPIE in February 2019.

It is understood that the clause will allow for either dedication of dwellings or the payment of a monetary contribution, which is appropriate and supported.

2.2 Design Excellence

The EIE proposes to insert a design-excellence provision into the Canada Bay LEP requiring development within the Rhodes Precinct to demonstrate design excellence. The clause will be applied to all land identified on the Key Sites map within the Rhodes Precinct. It will also apply to the construction of a new building or external alterations to an existing building if the new building or existing building has a height of 12 metres or 3-storeys or more.

The proposed design excellence clause will require consideration of a range of matters, including standard of architectural design, materials, detailing, impact on view corridors, street frontage heights, environmental impacts such as sustainability, impact on the public domain and landscape design. Certain sites will have additional matters to be considered relating to overshadowing of public parks and open spaces.

A competitive design process will be required for certain specified development, including development greater than 28 metres or 8 storeys (or both). The consent authority will be required to take the results of the design competition into account when assessing a project. Design competitions are required to follow the Government Architect's draft Design Excellence Competition Guidelines issued in May 2018.

The Property Council supports design excellence and encourages the use of a range of mechanisms to measure design excellence. Design competitions can be useful tools to deliver great design outcomes, however they can be very costly to manage. Although the Property Council does not oppose the use of design competitions within the Rhodes Precinct, there must be recognition of the costs associated with these processes and incentives provided to proponents to compensate them for the costs they incur holding design competitions.

2.3 Infrastructure funding and staging

2.3.1 Infrastructure Funding

The draft masterplan and EIE identify a range of infrastructure items to be provided to support the proposed growth in Rhodes. These include new and augmented infrastructure such as transport, educational facilities and open space.

Contributions for local infrastructure will be collected in accordance with Canada Bay's Section 7.11/7.12 contributions plans and these have a soft capped of \$20,000 per dwelling.

Regional infrastructure will no longer be funded through a Special Infrastructure Contribution (SIC) levy, of approximately \$21,900 per dwelling, which was exhibited in December 2017. Instead there will now be a "satisfactory arrangements" clause inserted within the LEP to ensure all developments make a reasonable contribution towards State public infrastructure. We understand that a VPA process will be required to satisfy these arrangements.

The Property Council is concerned about the cumulative impact of contributions and levies on development and their impact on housing affordability. The move from a SIC to a SAC also removes the previous transparency regarding the potential impact of infrastructure provision on development costs.

2.3.2 Infrastructure Staging

The EIE explains that future development must be supported by appropriate transport infrastructure needed to accommodate orderly growth in the precinct. To do this, a new provision is proposed that will ensure no more than 3,000 new homes can be delivered in the precinct. DPIE, Council and Transport for NSW will consider lifting this cap in the future once further regional infrastructure commitments are in place or delivered to support further development of the precinct.

The Strategy indicates that transport and traffic modelling has identified limitations in the additional development that can be supported without 'city serving' infrastructure upgrades, such as upgrading to the Main Northern Railway line. Unlike many parts of Sydney, the Rhodes Peninsula enjoys good rail, bus, ferry and road connections, including links to nearby areas such as Meadowbank, Wentworth Point, Sydney Olympic Park and Ryde. The Property Council would not support such a limit on future development being imposed unless there is no alternative option available to allow the precinct to grow to its full potential.

The EIE indicates that future development within the Leeds Street character area will be staged. The consent authority will be required to consider a staging plan prepared by DPIE for the Leeds Street area. The plan will consider matters such as land use history, acid-sulfate soils and realisation of the 'super basement' described in the masterplan. We support the staging of future development in this area where it will provide an orderly urban renewal outcome.

2.4 Resilience Development

The EIE proposes the introduction of sustainable utilities infrastructure to ensure resilient development and improve water and energy efficiency in the precinct. It is intended to establish sustainability bonuses and a resilient local provision in the LEP.

The Strategy is proposing incentives for developments that surpass current BASIX targets. A bonus FSR of 5% is proposed for the Station Gateway East, Cavell Avenue and Leeds Street character areas that achieve higher BASIX targets (40% for Energy consumption and 60% for Water consumption). We support and encourage greater use of an incentive-based approach to drive best-practice sustainability outcomes.

An amendment to the LEP will require the following items for the erection of new buildings in the precinct:

- a) separate reticulation for potable and non-potable water. All non-potable water demands (including toilets and irrigation) shall be connected to the non-potable reticulation network; and
- b) land and associated easements for embedded electricity generation and distribution.

The Property Council generally supports the adoption of sustainability measures in buildings. Where there are considerable upfront costs involved to install this infrastructure, it is our preference that these should be encouraged on a voluntary-basis and an incentive be provided to encourage developers to embrace these new technologies. DPIE should review the proposed clause to allow for flexibility regarding the installation of this infrastructure.

It may assist DPIE to be aware of the recent research project from the Property Council and Green Building Council titled *Every Building Counts*, which can be found at: <https://www.everybuildingcounts.com.au/>

2.5 Diversity of Dwellings

The EIE indicates that a dwelling diversity requirement proposed to be included in the LEP which will limit 2-bedroom dwellings to a maximum of 60% of all dwellings and require a minimum of 20% of dwellings to be 1-bedroom/studio and a minimum of 20% of dwellings to be 3-bedroom or more.

The Property Council supports greater housing diversity to meet a range of housing needs, including families, couples, singles etc. Mandating a certain proportion of apartments within each development to be of a certain size (number of bedrooms) does not always deliver the diversity of housing that communities require. There should also be a focus on different housing typologies, including low and medium density, across a wide area. Usually it is the developers who sell apartments to buyers that have a good understanding of the market and buyer's needs. We would encourage look at providing flexibility regarding how this clause is applied. We would encourage it to become design guidance rather than a mandatory requirement.

3.0 Conclusion

The proposed changes to Rhodes' planning controls are generally supported and will encourage further urban renewal of a largely run-down industrial precinct in Sydney's inner west. This precinct was identified as a Planned Precinct by DPIE in 2015 and this plan will deliver a much-needed transformation to complete the full renewal of the Rhodes Peninsula which began about a decade earlier.

The plan has identified significant transport constraints within the precinct, which will prevent its full potential of about 4,200 dwellings being realised, until there is a major augmentation of regional transport infrastructure. We encourage DPIE, Council and Transport for NSW to collaborate early to resolve this issue to allow the precinct's full development potential to be achieved.

Aspects of this plan will impose considerable costs on development, including local and State infrastructure contributions, affordable housing contributions, design excellence competitions and resilient development requirements. It is unclear from the package of materials released for consultation what additional costs will be incurred for each new dwelling. The cumulative impacts of these contributions and levies have been raised with DPIE by the Property Council previously and more recently with the NSW Productivity Commissioner.

Given the current COVID-19 induced recession facing the NSW economy, the introduction of some of these additional costs, charges and levies should either be delayed or discounted until the State's economic situation improves. The viability of residential apartment development in many parts of Sydney has been severely impacted by the COVID-19 pandemic and the cumulative impact of requirements that were developed in a pre-COVID environment will impact on the realisation of housing targets during 2020/21 and beyond.

9th October, 2020

Online Submission

Mr Brendan Metcalfe
A/Director of Eastern and South District
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Metcalfe

draft Rhodes Precinct Place Strategy

I write regarding *draft Rhodes Precinct Place Strategy* (Draft Strategy) prepared by the Department of Planning, Industry and Environment.

The revitalisation of the eastern portion of the Rhodes Peninsula has the capacity to assist with Sydney's post-COVID economic recovery. However, the private sector investment needed to deliver this recovery will be dependent on Precinct having the right level of development controls, together with sufficient flexibility to ensure feasibility of development. The Urban Taskforce oppose the overly prescriptive and restrictive development controls that, in the latest iteration of the draft Strategy, have rendered many sites unfeasible for redevelopment.

Overly-prescriptive and excessive development controls

Contrary to the feedback from industry in the development of earlier draft plans for the Rhodes Precinct, the draft Strategy includes some overly-prescriptive controls such as the mandated maximum car parking rates, minimum dwelling sizes and unit mix maximum or minimum percentage rates.

In terms of the proposed parking rates, it is unrealistic to prescribe City of Sydney 'category A' parking rates for a suburban strategic centre with only one railway station. City of Sydney 'category A' parking rates are the tightest in the Sydney CBD - a transport-rich city served by multiple heavy rail stations, metro stations, light-rail stops and 2 major ferry terminals.

Further, the excessively small average dwelling size adopted – around 80sqm across all dwelling types, is inconsistent with market demand.

The Urban Taskforce contends that provision of car parking, dwelling size and unit mix should be responsive to the needs of local market demographics.

The proposal to apply 'Missing Middle' housing typologies including Torrens Title terrace houses and townhouses within a few hundred metres of the station is also contrary to market demand. Furthermore, this scale of development in this location is uneconomic and unaffordable because of the underlying land value and requirement to consume a disproportionate land area, preventing the creation of new open space throughout the community.

Specific objection is raised to the proposed design excellence provisions of minimum tower separation of 40m for towers above 20 storeys and the sun access protection requirements. This is significantly in excess of ADG requirements. In the context of COVID-19, this represents the worst of over-zealous planning prescription working against investment, employment and affordable housing supply. (

In short, these provisions are excessive and will render some sites unfeasible for development.

The Urban Taskforce *recommends* that tower separation and sun access be considered as part of a site specific, merit-based impact assessment and not mandated under the SEPP.

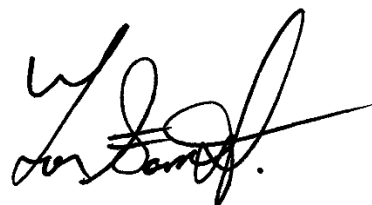
Feasibility implications of significant changes to earlier drafts

The Urban Taskforce is concerned about changes to the distribution of density across the precinct from that proposed in the 2018 Rhodes Revised Precinct Plan and as discussed with major land-owners in 2019.

This unanticipated change in DPIE direction creates uncertainty for investors. As a consequence, this change may impede the vision for Rhodes being realised by limiting and/or delaying the development of key sites. This will be further exacerbated by consequential delays to the subsequent delivery of local infrastructure including: new open space; a primary school; new community facilities; and, much needed new housing stock and employment opportunities.

Urban Taskforce *recommends* DPIE undertake meaningful and direct engagement with key landowners to ensure feasible development outcomes so that the revitalisation and potential of the Rhodes Peninsular can be realised.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish at the end.

Tom Forrest
Chief Executive Officer

