

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', written in a cursive style.

**Tom Forrest**  
Chief Executive Officer

