

JMT Consulting
PO Box 199
Kingsford NSW 2032
0415 563 177
www.jmtconsulting.com.au

Department of Planning, Housing and Infrastructure
4 Parramatta Square
Parramatta NSW 2124

25 June 2026

Dear Sir / Madam

This document is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in support of the Response to Submissions (RTS) to the State Significant Development Application (SSDA) (SSD-94006708) for a mixed use development at 15-21 Cottonwood Crescent, Macquarie Park.

The Proponent has received feedback from the Department of Planning, Housing and Infrastructure (**DPHI**), Transport for NSW (**TfNSW**) and City of Ryde Council (**Council**), following the submission of the transport impact assessment report as part of the EIS submission. The responses are identified and references are provided to show where they are addressed in this document.

Please do not hesitate to contact the undersigned should you have any questions in relation to this advice.

Regards

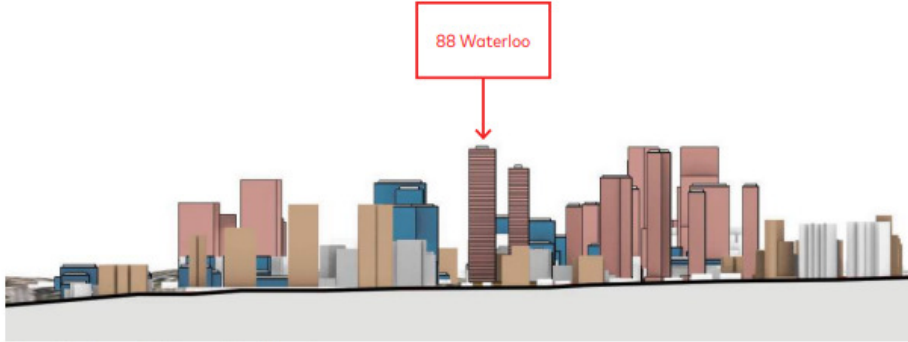


Josh Milston

Director | JMT Consulting

MIEAust CPEng

Agency	Agency Comment	JMT Consulting Response
DPHI	Provide the rationale and supporting evidence for the assumed directional splits for both arrivals and departures (e.g. a high -level origin -destination assessment and/or observed networks flows). Confirm whether the trip distribution diagrams include any potential U -turn movements via the Byfield Street roundabout for access to Cottonwood Crescent and whether inclusion of these movements would change any intersection modelling inputs/outputs. Where changes occur, provide updated intersection analysis result s.	Traffic distribution across the broader road network was developed on the basis of typical work destinations of residents of Macquarie Park based on Census data. This approach to traffic distribution was developed for the original DA for the site in consultation with Ryde Council technical staff, with this same approach consistently adopted for the subject SSDA. The traffic distribution assumptions are considered representative of future user behaviours and also reflect current traffic volumes for the area. The traffic distribution assumptions, alongside other inputs and outputs of the traffic modelling, were not objected to by either Transport for NSW nor Ryde Council in their submission to this SSDA. The modelling did not specifically consider u-turn movements at the Byfield Street roundabout. Any vehicle arriving from the north-east (i.e. via Herring Road) is assumed to travel straight through the Herring Road / Waterloo Road intersection prior to turning left into Windsor Road. This represents the shortest route by both travel time and distance and therefore most reflective of future user behaviour. In any case this movement would equate to 20-25 vehicles (maximum) at any time of the day and would not materially impact alter the intersection operation outputs.
TfNSW	The provision of approximately 733 car parking spaces for the residential component of development has been calculated using Ryde Council's Development Control Plan (DCP). Whilst the total number of car parking spaces complies with Council's DCP, there may be scope to consider reducing the parking spaces further given the site's proximity to the Metro, bus services, Macquarie University and Macquarie Centre.	The City of Ryde DCP specifies <u>maximum</u> parking rates for residential and mixed use development in Macquarie Park. The proposed quantum of residential car parking, being approximately 700 parking spaces, is significantly below the maximum possible parking amount of approximately 800 spaces. The reduced level of parking when compared to the maximum allowable number reflects the strategic location of the site adjacent to public transport and other services. Notwithstanding this a suitable level of on-site parking for residents is required to support travel to destinations not well served by public transport or outside of established centres. Given the proposed quantum of parking is below Council's maximum permitted rates, with supporting traffic analysis demonstrating acceptable impacts on the surrounding road network, the car parking arrangements are considered appropriate for the subject proposal.
TfNSW	TfNSW advises that the subject property is within an area currently under investigation for Macquarie Park Bus Priority & Capacity Improvement Project – Stage 2. The investigations completed to date indicate that part of the subject property could be required if the preferred option is adopted. It is emphasised, however, that the proposal may change, as future funding consideration may be given to progress the project. In the event that any land would be required for road purposes, the Land Acquisitions (Just Terms Compensation) Act 1991 guarantees that the amount of compensation for land that will be acquired by TfNSW will not be less than market value (assessed under that Act), as if the land were unaffected by any road proposal.	Noted – the applicant commits to collaborating with the TfNSW project team in relation to this matter if required.

Agency	Agency Comment	JMT Consulting Response
TfNSW	It is noted that the concurrent planning proposal seeks to amend planning controls applying to the subject site in the Ryde Local Environmental Plan 2014, to amend the maximum Height of Building (HoB) from 65m to 212m and existing permissible Floor Space Ratio (FSR) control of 4.5:1 to 16.8:1. The proposed FSR and HoB controls appear to be considerably higher than nearby sites, will result in significant development uplift and may set a precedent for similar planning proposals nearby. The EIS should provide detailed strategic justification/detailed planning analysis to support the scale and density proposed in the context of other recently approved developments. It is requested that the Response to Submissions provides additional details of this.	The Environmental Impact Statement (EIS) prepared by Urbis outlines in detail the strategic justification for the project. Separately the design report prepared by AJC Architects provides a skyline assessment comparing the proposed building height with other approved or planned developments in Macquarie Park, with an extract shown in the figure below.  Figure 74. Section B (Herring Road View) The strategic merit of the proposal was recognised in the decision of the Housing Delivery Authority (HDA) Ministerial Direction State Significant Development Declaration Order (No 12) 2025 dated 21 August 2025 formally declared the development as SSD – noting the EOI proposal for a future development comprising approximately 870 dwellings. From a transport perspective there is clear technical justification to the proposed height and density sought as part of the concurrent planning proposal, specifically: • The site is extremely well serviced by public transport and within close walking distance of key locations including Macquarie University and the Macquarie Shopping Centre – limiting the reliance on private vehicles. Improvements in public transport infrastructure such as the Macquarie University bus interchange and expansion of Sydney Metro will further support access by sustainable forms of transport. • The majority of cars within the development will only generate trips occasionally and be generally on a discretionary basis - mostly outside of commuter peak periods and will not impact the operation of the road network during the busiest times of the day • Traffic modelling of the proposal demonstrates the surrounding road network can accommodate the relatively minor increase in traffic movements. • The availability of various services within Macquarie Park and adjacent to the subject site, including residential, retail, employment, health and education, all within close walking distance of public transport, aligns with the '15-minute neighbourhoods' concept outlined in the TfNSW Future Transport Strategy.

Agency	Agency Comment	JMT Consulting Response
Council – Waste Management	Provide swept paths for a heavy rigid vehicle in accordance with AS 2890.02 to ensure waste collection vehicles can safely access the site for servicing. - The swept paths provided cannot be used to clearly identify the proposed transit of the 12.5 metre HRV utilised for waste collection. Swept paths must be clearly identified for each vehicle type. - The paths detailed in the Traffic Impact Assessment do not clearly show the vehicle body therefore conflicts cannot be determined. - The provided swept paths do not clearly demonstrate whether the proposed turntable is unobstructed from bins doors, or support structures. This space must remain clear of all obstructions to support safe and efficient servicing.	Full scale swept path plans are provided in Appendix A of this document, including for a 12.5m HRV utilised for waste collection. The swept paths include both the vehicle body and clearance envelope as required under AS2890.2. The swept paths confirm that the proposed turntable is unobstructed from bins doors, or support structures.
Council - Vehicle Access, Servicing Facilities and Parking	The development proposes to provide the maximum level of offstreet parking based on the parking rates in the DCP Part 9.3 (Parking Controls). Considering the site is opposite a major public transport hub, having access to many multiple bus services and Metro train service, this is an unacceptable arrangement and disregards the principals of a Transport Oriented Development. The objectives of the parking controls in the Macquarie Park corridor seek to reduce the reliance of private motor vehicles as a means of public transport. The proposal also exacerbates the matter by providing only 38% of the maximum residential visitor parking allocation. Given that restriction of resident visitor spaces has no effect in terms of vehicle ownership, it is also far less to influence the mode of transport for transient visitors to the site. Noting this and the very high demand for onstreet parking in the surrounding area, it is strongly advised that the allocation of visitor parking be maximized (86 spaces).	The City of Ryde DCP specifies <u>maximum</u> parking rates for residential and mixed use development in Macquarie Park. These maximum parking rates already recognise the strong level of public transport accessibility afforded in this area over other parts of the Ryde LGA. The high density residential developments across Metropolitan Sydney that form the basis of the guidance provided in the recently released TfNSW Guide to Transport Impact Assessment (GTIA) document included a rate of car parking of between 1.0 and 1.6 parking spaces per apartment. The subject development proposes a car parking rate of approximately 0.8 spaces per apartment – demonstrating that the proposed parking provision is already reduced when compared to typical high density developments across Sydney. The majority of residents will use their cars on a discretionary basis and undertake trips outside of busy road network periods. Parking spaces are required to mainly service 'non-discretionary' trips made outside of peak commuter periods when public transport is not as readily available – for example weekend sport, evening trips. The visitor car parking allocation is considered appropriate and complies with Council's parking controls noted in their DCP. Providing additional visitor parking spaces is not considered a suitable outcome from a traffic perspective and would have greater traffic impacts compared to providing for residential parking spaces. Visitors to residential developments typically have a duration of stay of between 1 to 4 hours – equivalent to an average traffic generation rate of 0.40 trips per parking space per hour. By comparison TfNSW surveys indicate resident parking spaces generate traffic at a rate of 0.15 trips per parking space – over 60% less in comparison to visitor parking. Converting over 50 resident parking spaces to visitor parking as requested by Council would have a detrimental impact on the surrounding road network. As the proposed quantum of parking for residents and visitors complies with Council's controls for the Macquarie Park corridor, no changes are proposed in response to Council's comments.

Agency	Agency Comment	JMT Consulting Response
Council - Vehicle Access, Servicing Facilities and Parking	The service area accommodates only a single lane of service vehicle traffic. It is warranted that the entry to the facility be widened or a waiting bay be provided inside the property at the entry (so as to allow two way, opposing vehicle flow). The possibility of service vehicles having to stand and block through traffic in Cottonwood Crescent whilst waiting for an opposing vehicle to exit cannot be supported.	It is acknowledged that the updated design provides for a single lane of traffic into and out of the loading dock. This arrangement can be managed through the implementation of a Loading Dock Management Plan (LDMP) with a complementary on-site booking system – as confirmed by Council's traffic officers in their submission to this SSDA. A loading dock booking system will be employed to control access to dock and spread the demand profile over the day. Deliveries will be required to be pre-booked to an allocated time slot of 30 minutes maximum dwell time. Trucks intending to use the dock will not be permitted to come to site without making a booking beforehand. The major benefit of the implementation of such a system is the ability to moderate demand throughout the day. The allocation of deliveries to timeslots (with strict length of stay limits) reduces the risk the loading dock reaching capacity and manages traffic flow into the site during peaks. The booking system also largely mitigates the risk of vehicle queues forming to enter the site and improving the flow of traffic on adjacent streets. Through the implementation of a LDMP and booking system the provision of a single entry/exit lane to the loading dock is considered acceptable. The booking system will spread demand throughout the day to limit any occasions of vehicles entering and exiting the loading dock at the same time. Electronic signage can be installed on Cottonwood Crescent alerting drivers of exiting vehicles from the loading dock. In the very rare event that a vehicle arrives at the same time another vehicle is departing the loading dock, the entering vehicle would wait for a very short period of time on Cottonwood Crescent which does not represent an unacceptable outcome. The loading dock entry is located well away from the Waterloo Road intersection and therefore this rare occurrence would not have flow on traffic impacts to the wider road network.
Council - Vehicle Access, Servicing Facilities and Parking	The architectural plans should include a section taken through both internal ramps so as to confirm that the required grades and height clearances are achieved. It is understood that the driveway may require crest thresholds to be provided to prevent inundation by flood waters and therefore this may complicate a typical stacked ramp design.	The updated architectural set includes a section through the ramps as requested by Council. All ramps have been designed to comply with the relevant requirements of AS2890.1 and AS2890.2.
Council - Vehicle Access, Servicing Facilities and Parking	The visitor parking section on Lower Ground is noted to terminate in a dead end aisle that is longer than 6 parking bays. As per AS2890.1, the arrangement will warrant a turning bay to be provided at the end of the aisle	Noted, this visitor parking space can be removed and a turning bay has been installed.

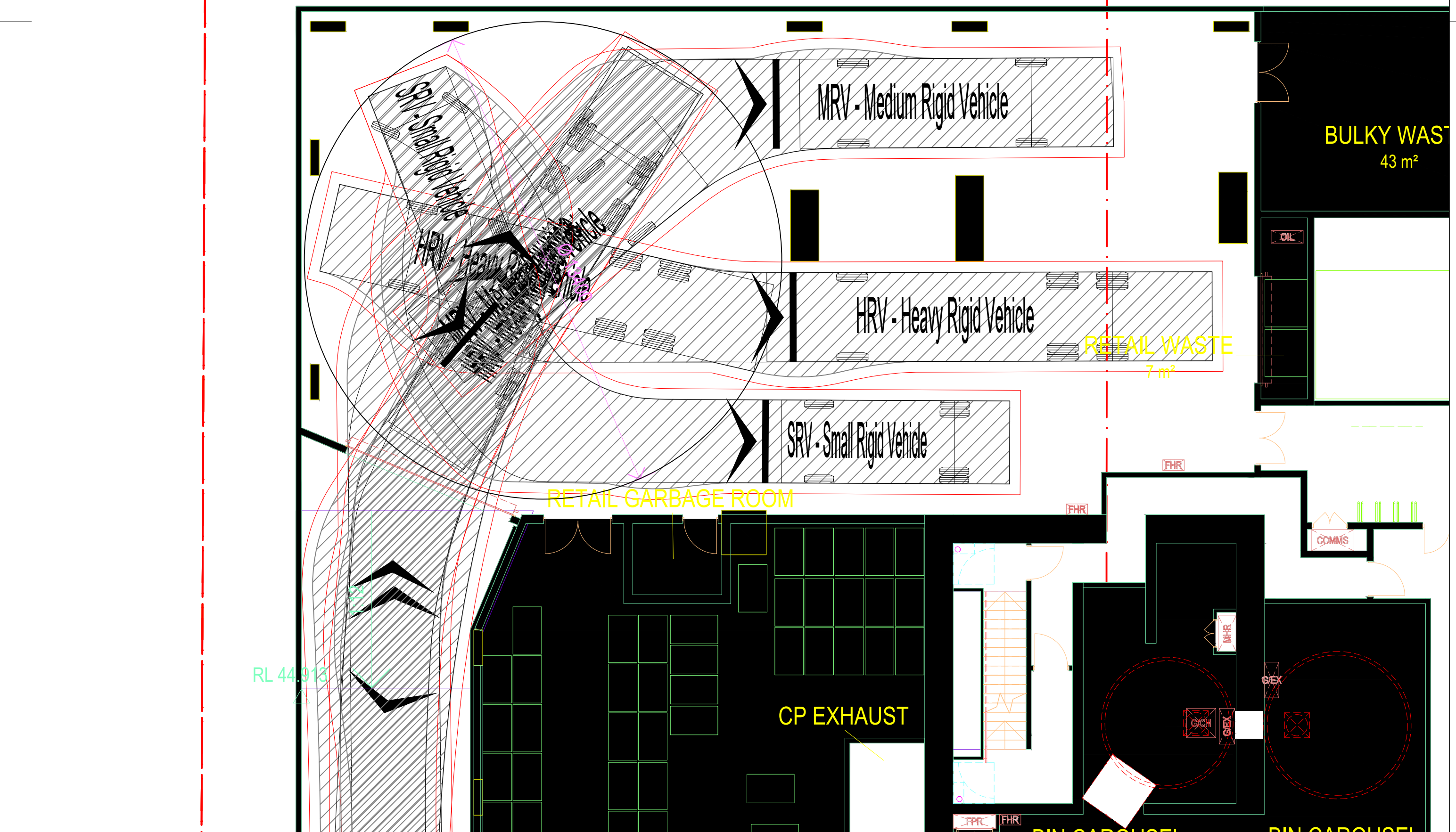
Agency	Agency Comment	JMT Consulting Response
Council - Vehicle Access, Servicing Facilities and Parking	The proposal is noted to accommodate tandem parking and this will warrant that such spaces be allocated to the same unit. This matter could be addressed by condition	Noted and agreed.
Council - Traffic Issues	It is noted that a preliminary Green Travel Plan (GTP) has been prepared as part of the TIA report. The mode share targets and measures outlined within this GTP would need to be altered/updated after finishing the construction works and prior to the issue of the occupation certificate to consider potential changes to the mode shares when the development is operational.	Noted, an updated GTP can be prepared prior to occupancy and incorporate the items raised in the Council submission
Council - Traffic Issues	In addition, a preliminary Construction Traffic Management Plan (CTMP) has also been prepared as part of the TPA report. The CTMP describes how traffic activity is proposed to be managed to minimise disruption and safety risks to other road users on the public road when the construction works proposed as part of this DA are being undertaken. The measures outlined within this CTMP would need to be altered/updated at a later stage to provide details on the number of construction workers and the number of truck movement into/out the site, the proposal of temporary access driveway, and to take account potential changes to the traffic conditions within the surrounding road network and/or potential changes to the construction methodology closer to the commencement of construction (i.e. ensure relevancy). This can be addressed through consent conditions at the Construction Certificate stage.	Noted, no objections raised to a suitably worded consent condition

Agency	Agency Comment	JMT Consulting Response																			
Council - Traffic Issues	Transport for NSW's <i>Guide to Transport Impact Assessment 2024</i> (GTIA) specify the following traffic generation rates applicable to the proposed residential development: High Density Residential Dwellings (high public transport accessibility) <i>AM Peak = 0.19 vehicle trips per dwelling</i> <i>PM Peak = 0.15 vehicle trips per dwelling</i> Retail <i>AM Peak = 1.55 vehicle trips per 100m2 Gross Leasable Floor Area</i> <i>PM Peak = 3.3 vehicle trips per 100m2 Gross Leasable Floor Area</i> Based on the above trip generation rates, the proposed 858 residential apartments is expected to generate up to 163 AM and 129 PM peak hour vehicle trips to and from the site. The proposed retail shops would be expected to generate up to 2 AM and 4 PM peak hour vehicle trips to and from the site as suggested by GTIA. Therefore, a total of 131 AM and 133 PM peak hour vehicle trips are expected to be generated by the proposed development	The traffic generation analysis undertaken for the project has been developed on the basis of the 'benchmarking method' as recommended in the Transport for NSW Guide to Transport Impact Assessment document.																			
Council - Traffic Issues	Regarding the impacts of the additional traffic generated by the proposed development on the operation of the surrounding road network, the submitted TIA with the SSDA indicates that the additional traffic volumes have been assessed with SIDRA modelling for the post-development scenario. The following table provides a summary of the SIDRA modelling results of the intersections in the vicinity of the development site: <table><tr><th rowspan="2">Intersection</th><th colspan="2">AM Peak</th><th colspan="2">PM Peak</th></tr><tr><th>LoS</th><th>Delay(s)</th><th>LoS</th><th>Delay(s)</th></tr><tr><td>Waterloo Road/Cottonwood Crescent</td><td>A</td><td>7</td><td>A</td><td>9</td></tr><tr><td>Windsor Drive/Herring Road</td><td>A</td><td>8</td><td>C</td><td>35</td></tr></table> Based on the results of the SIDRA modelling, the TIA concludes that all intersections would retain their level of service under a 'future base' scenario which takes into consideration background traffic growth from other developments in Macquarie Park.	Intersection	AM Peak		PM Peak		LoS	Delay(s)	LoS	Delay(s)	Waterloo Road/Cottonwood Crescent	A	7	A	9	Windsor Drive/Herring Road	A	8	C	35	Noted. The traffic modelling confirms the proposal would not have significant impacts on the surrounding road network. The submission provided by TfNSW did not raise any concerns with the proposal's traffic impacts.
Intersection	AM Peak		PM Peak																		
	LoS	Delay(s)	LoS	Delay(s)																	
Waterloo Road/Cottonwood Crescent	A	7	A	9																	
Windsor Drive/Herring Road	A	8	C	35																	

Agency	Agency Comment	JMT Consulting Response
Council	An internal loading dock is proposed within the lower ground level. This internal loading area provides three (3) loading bays (one for HRV, one for MRV and one for SRV) and a turn table to accommodate the needs of the site based on the yields achievable under the development proposal. Access to the loading dock is proposed via a one-way ingress/egress driveway connecting with Cottonwood Crescent at the south-western corner of the site. All vehicles will enter and exit the site from Cottonwood Crescent in a forward direction with the aid of a turntable. The TIA report indicates that The building management team will be required to engage and maintain a Loading Dock Manager to organise and supervise delivery and removal activities while a delivery schedule will be organised by management to stagger and control arrival of deliveries. To ensure that servicing arrangements including waste collection will be wholly accommodated within the site without interfering with the safety of all road users and the efficiency of traffic movements on the public road, a condition for Loading Dock Management Plan will be imposed as part of consent for this SSDA. The above are noted and Council will recommend conditions to be imposed should the development be approved on this site.	Noted and the applicant raises no objections to the recommended conditions in relation to the loading dock.
Department of Education	Traffic generated by the development should not result in significant congestion on local roads and appropriate works be undertaken where required to ensure satisfactory intersection performance, particularly on travel routes to the schools' pick-up and drop-off areas. A transport assessment should be prepared that considers potential impacts.	A transport impact assessment has been prepared in accordance with TfNSW guidelines which has considered the impacts of the additional traffic movements generated by the proposal. The traffic assessment confirms that the proposal would not significantly impact the operation of the surrounding road network, including travel routes to and from nearby schools.

Agency	Agency Comment	JMT Consulting Response
Department of Education	Measures should be incorporated in the development to encourage sustainable and active travel as part of the development to minimise impacts on the road network and air quality in proximity to the schools. Adequate pedestrian infrastructure, including footpaths and crossing points should also be included to encourage active travel to local schools.	A Green Travel Plan is included within the transport impact assessment and outlines measures to encourage sustainable and active travel. The development proposal incorporates active transport measures to support travel by this form of transport and reduce reliance on private vehicles. The measures take advantage of the site's location adjacent to Elouera Reserve and Shrimptons Creek, with connections to be provided to existing walking and cycling infrastructure. From the site pedestrians and cyclists have a range of options including high quality connections along Waterloo Road to bus stops and the Macquarie University metro station which is less than a 5 minute away.
Department of Education	— If approved, it is recommended the proposal be conditioned to prohibit construction vehicles accessing and egressing the site during school drop-off and pick-up times (30 minutes before and after school start and finish times). — Work zones should not be proposed in locations that will compromise pedestrian, cyclist and vehicular access to the school and associated drop-off and pick-up spaces. — Pedestrian and cyclist safety should be closely considered and managed including where necessary, traffic controllers for construction vehicle entry and exit movements. — If any impacts to school bus services are anticipated, these should be addressed and mitigated through the CMP.	The applicant will prepare a detailed construction traffic management plan (CTMP) prior to the commencement of works on the site. This detailed CTMP will incorporate various measures to reduce the construction traffic related impacts of the proposal, including consideration of the items noted in the Department of Education submission.

APPENDIX A – UPDATED SWEEP PATH ANALYSIS



Job Title
88 Waterloo Road

Client
Billbergia

JMT Consulting
ABN: 32 6358 30054
www.jmtconsulting.com.au
PO Box 199, Kingsford NSW 2032

Drawing Title
Turning Paths

Drawing No
2354_01

Date
12.06.26

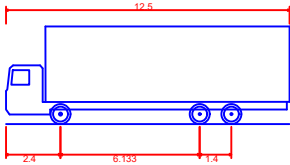
Legend

- Body Envelope
- 300mm Envelope
- Wheel Envelope

Job No
2354

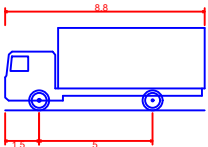
Scale at A3
1:100

Vehicle type(s)



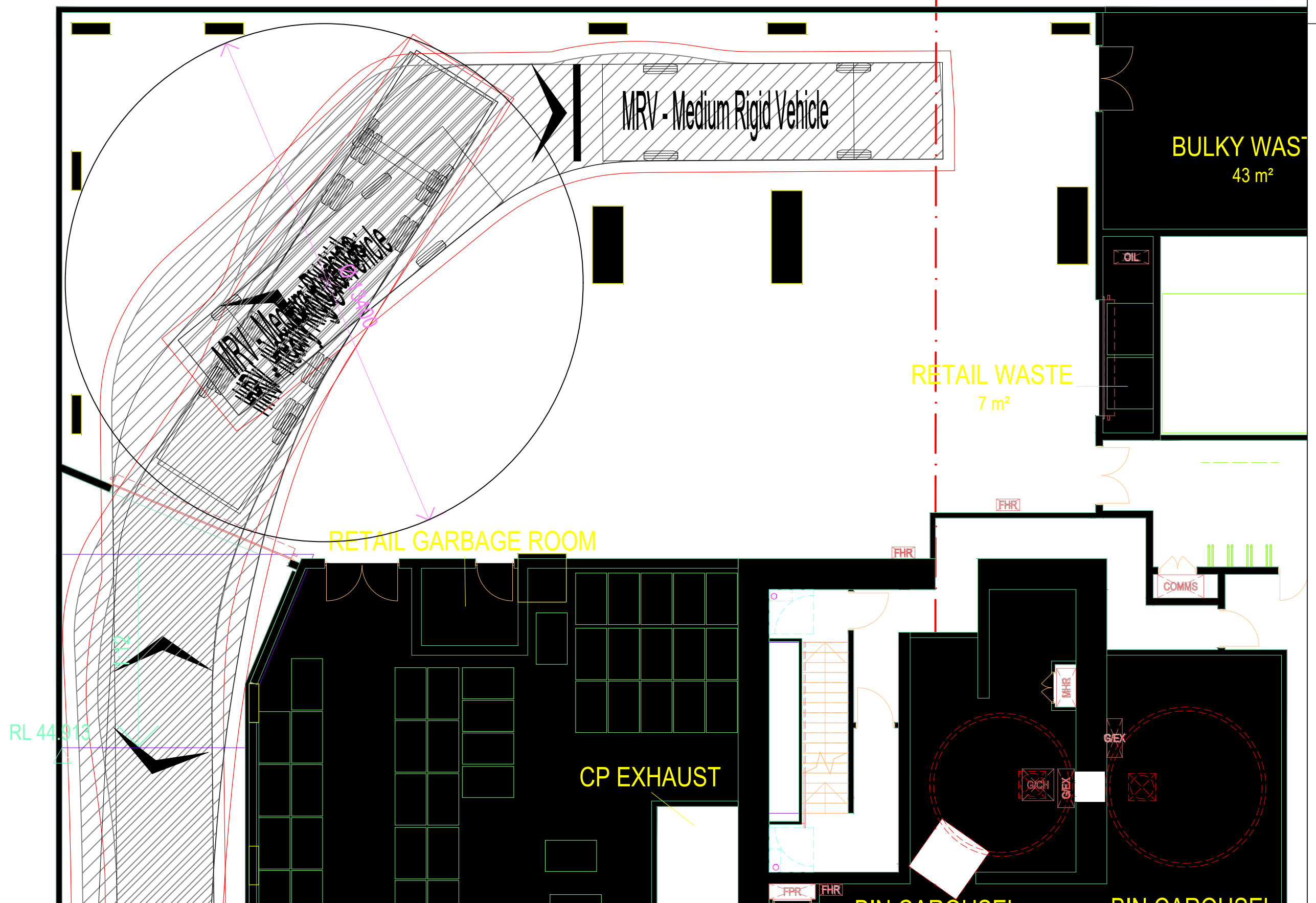
HRV - Heavy Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

12.500m
2.500m
4.300m
0.417m
2.500m
6.00 sec
12.500m



MRV - Medium Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

8.800m
2.500m
3.633m
0.428m
2.500m
4.00 sec
10.000m

**Job Title**

88 Waterloo Road

Client

Billbergia

JMT Consulting
ABN: 32 6358 30054
www.jmtconsulting.com.au
PO Box 199, Kingsford NSW 2032

Drawing Title

Turning Paths

Drawing No

2354 01

Date
12.06.26

Legend

Job No

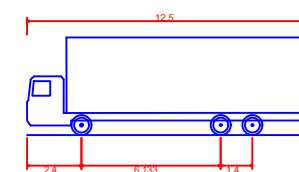
2354

Scale at A3

1:100

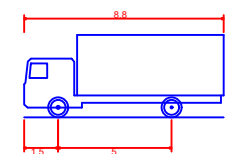
Body Envelope
300mm Envelope
Wheel Envelope

Vehicle type(s)



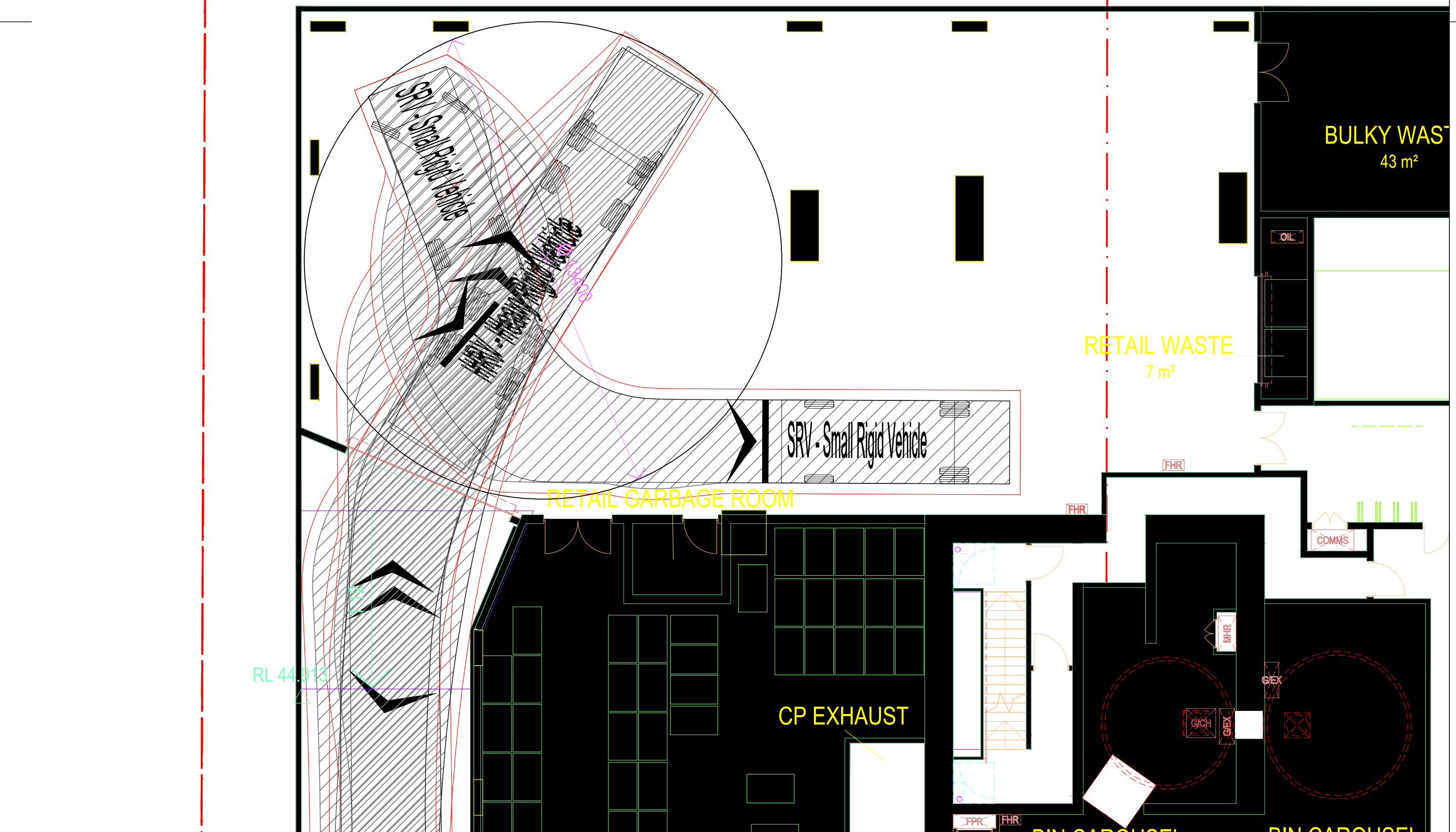
HRV - Heavy Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

12.500m
2.500m
4.300m
0.417m
2.500m
6.00 sec
12.500m



MRV - Medium Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

8.800m
2.500m
3.633m
0.428m
2.500m
4.00 sec
10.000m



Job Title
88 Waterloo Road

Client
Billbergia

JMT Consulting
ABN: 32 6358 30054
www.jmtconsulting.com.au
PO Box 199, Kingsford NSW 2032

Drawing Title
Turning Paths

Drawing No
2354_01

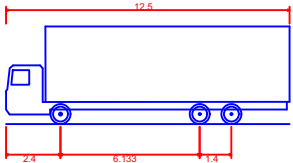
Date
12.06.26

Legend
— Body Envelope
— 300mm Envelope
— Wheel Envelope

Job No
2354

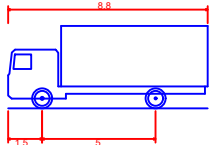
Scale at A3
1:100

Vehicle type(s)



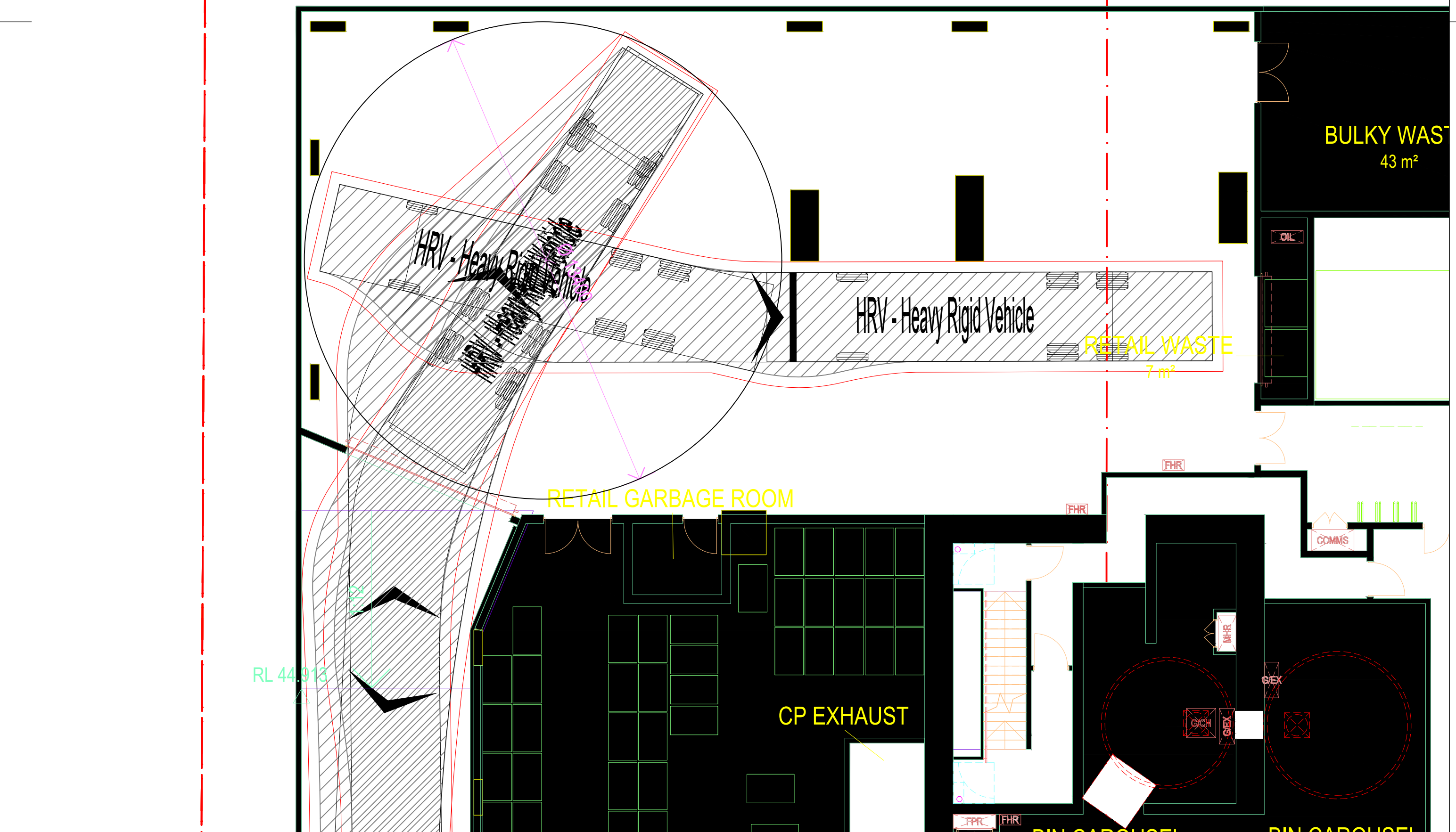
HRV - Heavy Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

12.500m
2.500m
4.300m
0.417m
2.500m
6.00 sec
12.500m



MRV - Medium Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

8.800m
2.500m
3.633m
0.428m
2.500m
4.00 sec
10.000m



Job Title
88 Waterloo Road

Client
Billbergia

JMT Consulting
ABN: 32 6358 30054
www.jmtconsulting.com.au
PO Box 199, Kingsford NSW 2032

Drawing Title
Turning Paths

Drawing No
2354_01

Date
12.06.26

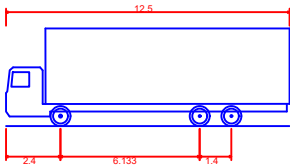
Legend

- Body Envelope
- 300mm Envelope
- Wheel Envelope

Job No
2354

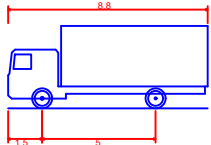
Scale at A3
1:100

Vehicle type(s)



HRV - Heavy Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

12.500m
2.500m
4.300m
0.417m
2.500m
6.00 sec
12.500m



MRV - Medium Rigid Vehicle
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Curb to Curb Turning Radius

8.800m
2.500m
3.633m
0.428m
2.500m
4.00 sec
10.000m