

Subject: FW: Request for Extension of Time - 6 Halifax Street SSD-65931214 -COR2023/197

From: Nicholas Najar <[REDACTED]>
Sent: Thursday, 21 March 2024 3:49 PM
To: Prity Cleary <[REDACTED]>
Cc: Sanju Reddy <[REDACTED]>; Carine Elias <[REDACTED]>
Subject: Request for Extension of Time - 6 Halifax Street SSD-65931214 -COR2023/197

Dear Prity

Council understands the submission for 6 Halifax Street (SSD-65931214), Macquarie Park Affordable Housing SSD Application was due on the 25/03/24. Council is unable to make the submission date. As such Council is currently preparing its submission, an extension of time to the **22nd of April 2024** is requested.

Council will be making a submission on the proposal and appreciates the additional time to finalise its submission. In short, **Council objects to** the Application in its current form and Council's submission will be raising issues that will need to be addressed prior to any determination. Certain issues but not all include:

- 1) **Application is inconsistent with Council's Pre-DA Advice:** Its noted that prior to the SSD pathway been available to the Applicant, they engaged Council with a formal Pre-DA and UDRP Meeting. Attached is Council's Pre-DA/ UDRP advice and supplementary advice. The attached advice contains numerous issues that was raised on the scheme Council reviewed. In review of the EIS and associated document, the applicant has not addressed the issues Council raised. The Application before DPE is largely unchanged and does not address key matters such as separation, waste, vehicle access and basement design. Council detailed submission will raise similar themes as previously raised in the attached pre-DA advice.
- 2) **Inadequate consultation:** The Applicant has not engaged Council regarding the SSD application. The only engagement to date was the formal pre-DA meeting, which was well before the issued SEARs on the 14th of December 2023. The Issued SEAR's required the Applicant to engage with City of Ryde Council to understand its issues that would inform their EIS. The Applicant has undertaken no engagement with Council from the issuing of its SEARs therefore, no feedback has informed its EIS that is on public exhibition. Whilst a formal Pre-DA was held, this pre-dates the SEARs being issued. This inadequate consultation results in the proposal being inconsistent with DPE's guidelines for *Undertaking Engagement Guidelines for State Significant Projects October 2022*. Due to the lack of consultation it is unclear how the applicant satisfied item 26 of the issued SEARs.
- 3) **Waste Management:** As outlined in Council's Attached advice, waste management remains a core issue on the site, and the proposals form does not appropriately respond or provide adequate waste management. These issues include:
 - a. **Vehicle Access.** Council has previously provided advice that Heavy Rigid Vehicles (HRVs) are utilised for all domestic bin and bulky waste collection services.
 - b. **Deposition of waste.** The proposed transport of all waste by residents to basement storage rooms is not recommended for buildings taller than 4 storeys. It is likely to create significant waste management issues on site. Waste chutes are to be provided on each residential level for the efficient disposal of household garbage and recyclables
 - c. **Bulky waste storage and access.** The required manoeuvre to reverse the bulky waste collection vehicle across the Basement 2 access and main site driveway would require the building manager to arrange a traffic controller in advance to ensure the safety of other basement users. Collection staff cannot practically provide advance notice of arrival times during a servicing run and is likely to cause significant disruption to other basement users.

- 4) **Easement Encroachment and Flooding:** As previously advised, the applicant is to remove all encroachments from the easement that traverses its western boundary. The application as submitted demonstrates that the works encroach the easement. All structures should be free of the easement and its airspace. Other matters relating to civil engineering include:
- a. The proposed development is located adjacent to the Council's drainage system, please demonstrate that the footing of the proposed structure is below the adjacent invert levels of the Council's drainage system and no loading is placed on Council's drainage system. Structural plans to be prepared by qualified structural engineer including the footings and foundations of all proposed structures adjacent to the existing Council.
 - b. Full electronic copies of executable TUFLOW modelling file compatible with QGIS software (including batch file for run and flood difference file) clearly identifying each scenario shall be submitted to Council for further assessment. Electronic copy of modelling results for pre and post development scenario for velocity, depth, flood level, VxD and VxD afflux, flood level afflux for 1% AEP and PMF in .asc format shall be submitted.
- 5) **Overshadowing:** Solar access for southern public park Lot 108: - it is unclear if the current proposal is consistent with the approved *Detail Shadow Analysis-Proposed Mod-2* and the *City of Ryde Urban Design Guidelines* - Overshadowing and Accessing Sunlight limits Control clause 4.4.2.3: which requires at least 50% of new and existing public open space is to receive 3 hours direct sunlight between 9am and 3pm on June 21. The proponent is to demonstrate that this can be achieved.
- 6) **Urban Design:** Council and the UDRP provided detailed written feedback on the applicants proposed built form. The Applicant is to refer to the previous advice from Council and address this advice. Key issues include:
- a. The Applicant should investigate a more slender and taller towers by cutting some GFA from the edges and taking the lost GFA to new additional upper floors. Currently the scheme proposes a building height of 43.4m height against permitted height of 75m.
 - b. Non-compliant Mews Road is not adequately justified. Council's previous advice on this is contained in the attached advice, which the applicant is to refer to.
- 7) **Traffic** – Council has detailed concerns with the Applications traffic impacts, that of which will be outlined in Council's Detailed Submission. Key issues include:
- a. **Garbage vehicle.** The required garbage vehicle would be 12.5m long HRV with 4.5m height clearance. Therefore, the proposed MRV loading bay would not be suitable for the garbage collection in the future, and the proposed loading bay should accommodate Council's HRV garbage vehicle.
 - b. **Parking on Mews Road.** The proposed 3 carshare parking bays and 1 visitor parking bay on Mews Road may be impacted during 12.5m HRV turning into/out the site. This would require the car share spaces to not be parked in from 6am to 11am. As advised in Council's advice this is not practical or supported.
 - c. **HRV Manoeuvring:** Council requires swept paths of HRV trucks entering and exiting the site, as well as through the basement.
- 8) **Public Domain** – Council has detailed concerns with the Applications public domain impacts, that of which will be outlined in Council's Detailed Submission

The above is a short summary of what Council's detailed submission will raise. Please be advised that the above list is just a draft list and a more detailed submission will follow.

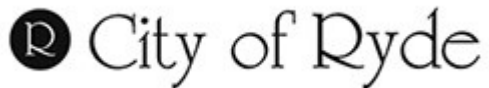
Council welcomes the opportunity to engage with both DPE & the Applicant on the issues that will be raised in the Council submission.

I trust the request for extension is acceptable. I will formally request this via the portal. Any issues please let me know.

Kind Regards
Nic

Nicholas Najar
Development Advisory Officer - Town Planner
DEVELOPMENT ADVISORY SERVICES

M
E
W



Customer Service Centre 1 Pope Street, Ryde (Within Top Ryde City shopping centre)
North Ryde Office Riverview Business Park, Building O, Level 1, 3 Richardson Place, North Ryde

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The City of Ryde wishes to acknowledge the Traditional Custodians of the Land on which we work and pay our respect to the Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

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