

PRELODGE MENT PANEL ADVICE EIS CONSULTATION AND ADVICE

PROPERTY:	2-4 Giffnock Avenue, Macquarie Park	
MEETING DATE:	5 June 2025	TIME: 2pm to 3pm
PRELODGE MENT No:	PRL2025/0014	
DEVELOPMENT:	Mixed-use development comprising two tower elements above podiums, with retail premises, a childcare centre and residential uses within the building envelopes and recreation and infrastructure uses on the remainder of the site.	
ATTENDANCE:		
Council:		
Nicholas Najar	Acting Senior Co-Ordinator Development Advisory Service	
Michael Cuthbert	Infrastructure Strategy & Planning Coordinator	
Mark Taylor	Senior Coordinator Park Planning	
Daniel Pearce	Senior Coordinator Engineering & Landscaping Services	
Joey Huang	Acting Senior Coordinator Transport Development Services	
Robert Platt	Development Contributions Coordinator	
Leila Faghihi	Senior Engineer Stormwater & Floodplain Management	
Justin Byrne	Senior Civil Engineer Activation & Compliance	
Jeremy Giacomini	City Architect	
Shannon Butler	Senior Town Planner	
Proponents:		
Danielle Wigg	Keylan Consulting	
Jayne Klein	Keylan Consulting	
Eliyah El Khoury	Holdmark	
Nicholas Bandounas	StudioSC Architects	
Nicole Wilson	Arcadia Landscape Architects	

NOTES FOR PROPONENTS

The Application is proposed under the State Significant Development Pathway with the Department of Planning Housing and Infrastructure being the consent authority. This advice serves as a record of Council's consultation and detailed advice provided to the Proponent to assist them prepare their Environmental Impact Statement (EIS).

This advice contains technical advice that is recommended to be considered and addressed in any EIS submission. The Pre-EIS advice does NOT constitute a formal assessment of your proposal and at the time of EIS Lodgement Council will undertake a detailed review of the complete application. A complete application should address this advice and respond to the issues raised.

Introduction

On 13 December 2024, the Applicant requested Secretary's Environmental Assessment Requirements (SEARs) for a mixed-use development on the site.

On 8 January 2025, SEARs were received. The SSD application number is SSD-79017211.

Having received SEARs for the proposed mixed-use development, the Applicant (Holdmark) sought preliminary discussions with Council to inform the Environmental Impact Statement (EIS) that is currently being prepared.

The Minister for Planning (or its delegate) is the Consent Authority for the SSDA application. However, City of Ryde Council (Council) as the local government authority for the site to which the application relates is identified as a key stakeholder and detailed consultation with Council is therefore required by the SEARs.

Keylan Consulting (on behalf of Holdmark) has engaged Council in a formal Pre-EIS review of their proposal for detailed feedback. To support the Pre-EIS review, the Applicant provided Council with a draft package dated 13 May 2025 including:

- *Covering letter from Keylan Consulting*
- **Appendix 1** *Planning Secretary's Environmental Assessment Requirements (SEAR's)*
- **Appendix 2** *Architectural Plans and Presentation*
- **Appendix 3** *Development Summary*
- **Appendix 4** *Design Competition Exemption*

Council's detailed advice to inform the EIS is provided below.

THE SITE

The Site is located at 2-4 Giffnock Avenue, Macquarie Park and is legally described as Lot 1 in DP1310550 (Figure 1). The site applies to part of 2-4 Giffnock Avenue, noting the north-eastern part of the site contains a recently constructed 19 storey serviced apartment development which does not form part of the subject site or current proposal.

The site has an area of 12,720m² and is irregular in shape. It directly adjoins commercial uses to north and south, multi-level serviced apartments and Lane Cove Road to the east, and mixed use and commercial developments to the west.

The site is in the Macquarie Park Precinct and recently received a rezoning for changes to incentive floor space, incentive height and land use zoning under the Transport Oriented Development (TOD) Accelerated Precinct. The site is identified as Key Site 6 under the RLEP 2014 which has specific public benefit requirements to enable to proposed height and FSR.



Figure 1: Locality and Context Plan markup (Base Source: Ryde Maps)

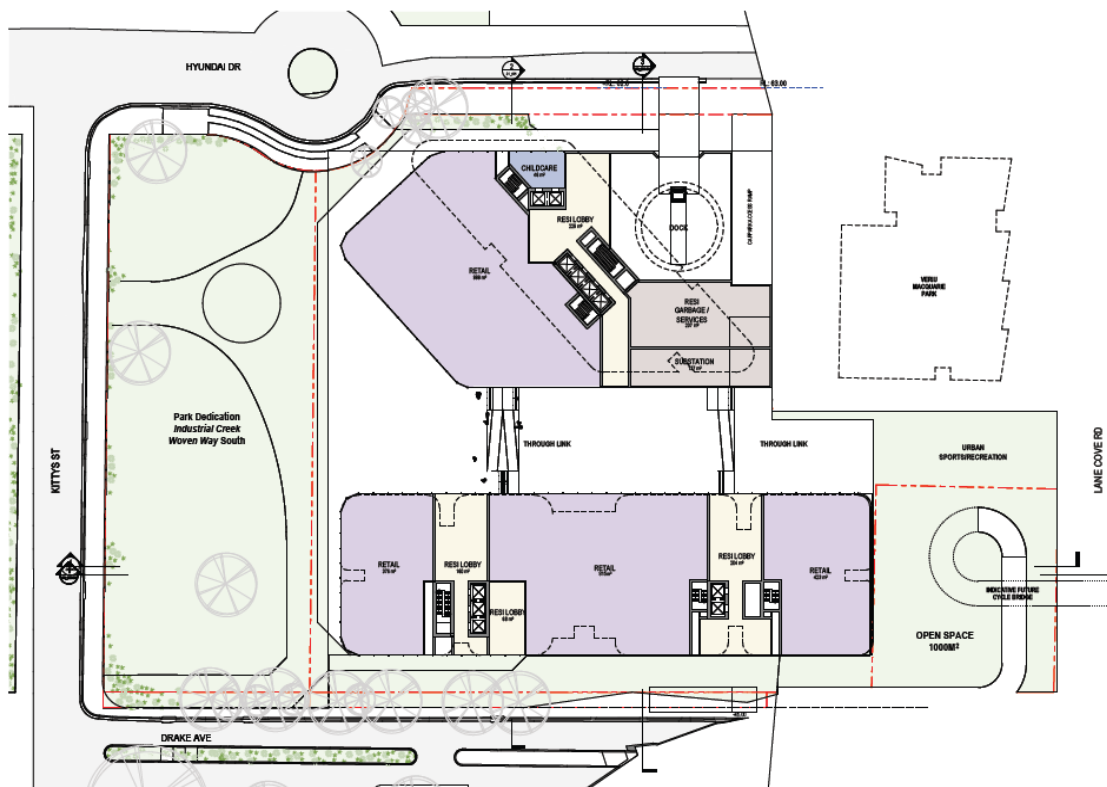


Figure 2: Site Plan (Source: Studio SC Architects)

THE PROPOSAL

The proposal includes the construction of a mixed-use residential and commercial development comprising over 670 residential apartments including a 10% affordable housing contribution and provision of open space and road infrastructure. It includes:

- Demolition of the existing buildings (Not including existing serviced apartments)
- Construction of two tower elements with a max height of 131.2m-132.2m that includes a range of uses
 - Ground floor retail and childcare
 - Childcare on level 1 of the north-eastern tower
 - Residential uses of approx. 670 units
 - 10% affordable housing (3% in perpetuity and 7% for 15 years).
- Dedication of land for infrastructure purposes including open space and bridge infrastructure in accordance with Clause 7.13 of the Ryde Local Environmental Plan 2014 (RLEP) and the Macquarie Park Design Guide
- Embellishment of the dedicated open space area
- Associated landscaping
- GFA: 64,546m²
- Parking: 795 spaces
- Public and private communal open space: 8,285m² of (65%) comprising 4,260m² private communal open space, 3,025m² park dedication and 1,000m² bridge dedication
- Deep soil: 5,073m² (39%)

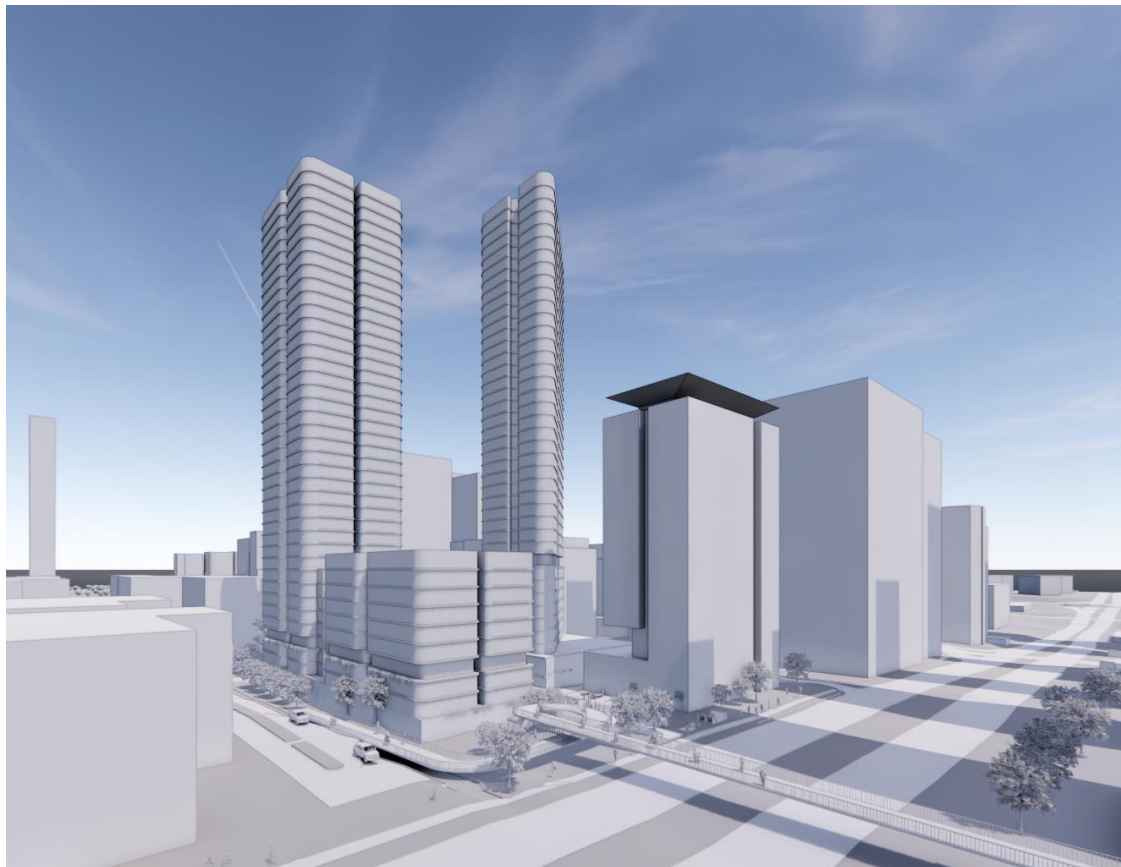


Figure 3: Perspective from Lane Cove Road (Source: Studio SC Architecture)

APPLICABLE STATUTORY PLANNING CONTROLS & POLICIES

Statutory Planning Controls

The following planning & building controls are identified as applicable to the development:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy Housing 2021*
 - *Chapter 4 Design of residential apartment development*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *Ryde Local Environmental Plan 2014*
- *Macquarie Park Design Guidelines*
- *Macquarie Park Corridor Section 7.12 Local Infrastructure Contributions Plan April 2025*
- *Ryde Development Control Plan 2014*

Applicable Environmental Planning Instruments

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) applies to the development. Any development application submitted must demonstrate consistency with its aims and objectives. The development will be considered under *Division 4.7 State Significant Development of the EPA Act* and DPHI will be the consent authority.

Environmental Planning and Assessment Regulation 2021

The *Environmental Planning and Assessment Regulation 2021* (EPAR 2021) applies to the development. The submitted development application is required to be consistent with its requirements, under *Part 3 Development applications* and other relevant sections of the *EPAR 2021*.

State Environmental Planning Policy (Planning Systems) 2021

The residential component of the development has an estimated development cost greater than \$60 million and, therefore, is State Significant Development pursuant to Section 19 of Schedule 2 of the Planning Systems SEPP.

State Environmental Planning Policy Housing 2021 - Chapter 4 Design of residential apartment development

Chapter 4 of the Housing SEPP applies to the development. The Applicant is advised to meet compliance with controls contained in the Apartment Design Guide. Although the proposal is in its early stages, it will be a requirement for any future proposal to demonstrate that the proposed building envelopes can accommodate ADG-compliant apartments. The tabled plans indicated that the scheme was able to achieve compliance with Solar, Cross Ventilation, open space and more.

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 Remediation of land

The requirements of Chapter 4 of the Resilience and Hazard SEPP will apply to the site. In accordance with *4.6 Contamination and remediation to be considered in determining development application* of the Resilience and Hazard SEPP. It is understood that a Contamination assessment will be provided with the EIS as required by the SEARS.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The EIS should address the relevant clauses under this Environmental Planning Instrument (EPI). Council's detailed Traffic advice is contained in the Comments section below.

State Environmental Planning Policy (Sustainable Buildings) 2022

The development will trigger the requirements of the Sustainable Buildings SEPP. The EIS should demonstrate compliance with Chapter 2 of the SEPP. BASIX Certificates are required to accompany the application addressing the residential component of the development.

A detailed ESD report is to be provided with the application. Council particularly emphasises demonstrating that:

- Water consumption is reduced.
- Reduce energy and electricity use where possible and use renewable energies.
- Minimise waste from construction and consider circular economy principles to reduce carbon footprint.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 Vegetation in non-rural areas & Chapter 6 Bushland in urban areas

The proposal involves the removal of numerous trees on the site. The EIS will need to demonstrate that trees must be replaced in accordance with *Section 6 of the Urban Forest Technical Manual* (to effectively maintain the Urban Forest canopy). Council will be seeking a 3:1 replacement ratio of trees. Should replacement tree planting not be provided on site, A condition of consent requiring a replacement tree fee be paid to Council is required.

RYDE LEP 2014

Zoning and Permissibility

The proposal is located on land subject to the provisions of the *Ryde Local Environmental Plan (RLEP) 2014* and is part zoned MU1 Mixed Use and part E2 Commercial Centre (Figure 4). As per the Land Use Table within the RLEP 2014, only part of the proposed development is permissible with consent as:

- Shop top housing, recreation areas and roads are permissible with consent in the MU1 zone.
- Road infrastructure facilities and roads are permissible with consent in the E2 zone.
- *Note:* Residential Accommodation (Shop Top Housing) is prohibited in the E2 Zone.

Council notes that part of the site that is zoned E2 does not permit Shop Top Housing with development consent, therefore it is recommended that no part of the shop top housing is to protrude into the zone boundary of E2 Land. To demonstrate this, it is recommended that the architectural plans overlay the zone boundaries on the plans.

Further comment will be provided below as it relates to Floor Space Ratio.

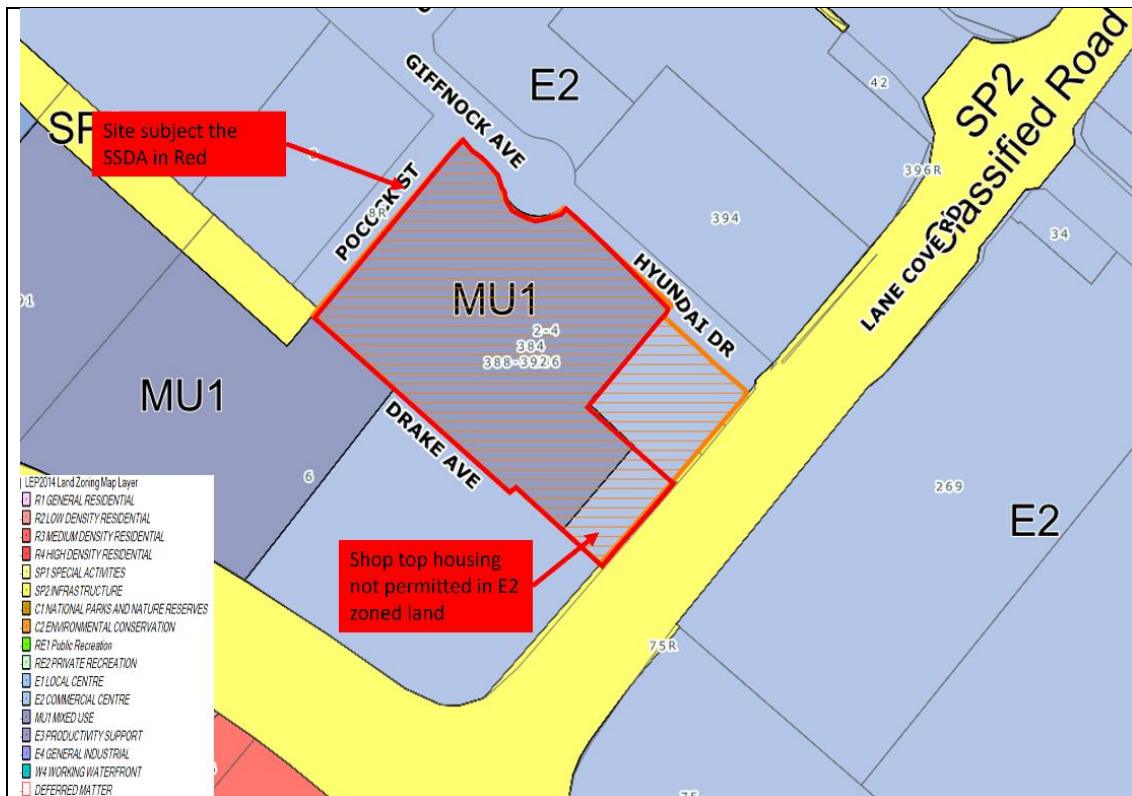


Figure 4: Mark up of Zoning Extract (Base Source: Ryde Maps)

Height of Building

In accordance with the provisions of Clauses 7.7 and 7.13 of the RLEP 2014, the site benefits from a maximum incentive building height of 130 metres (m). The tabled proposal involves a minor variation to the incentive height control of 1.5m to 2.5m to accommodate the lift overruns.

A Clause 4.6 request is required to accompany the application addressing the building height variation. Council may be able to support minor breaches associated with stairs and lift overrun exceedances, subject to the demonstration of sufficient environmental planning grounds.

As DPHI is the consent authority they will need to be satisfied of any exceedance.

Floor Space Ratio

In accordance with the provisions of Clauses 7.13 of the RLEP 2014, the site benefits from a maximum incentive Floor Space Ratio (FSR) of 4.75:1. The tabled plans state that the application seeks an FSR of 5.07:1 being 0.32:1 over the permissible FSR.

As noted in the meeting with the Applicant, the FSR plans have included the land zoned E2 in its calculation (refer Figure 4). The E2 zone does not permit the land use "Residential Accommodation" which shop top housing is a subcategory of.

In accordance with the calculation of FSR under Clause 4.5 *Calculation of floor space ratio and site area* of the RLEP 2014 the site area of land that does not permit the land use cannot be included in the calculation of site area for the purposes of GFA. Clause 4.5(4) states:

- (4) **Exclusions from site area** The following land must be excluded from the site area—
- (a) land on which the proposed development is prohibited, whether under this Plan or any other law,
 - (b) community land or a public place (except as provided by subclause (7)).

As part of the site is zoned E2 which prohibits Shop top housing (by virtue of prohibiting "residential accommodation"), the area associated with the E2 zoning cannot be included in the site area for the purposes of FSR calculation.

It is noted that the area has undergone recent rezoning by DPHI in a very short time. The rezoning of Key Site 6 has failed to consider the implications that a split zoning would have on a detailed application, resulting in this strategic anomaly in Councils view. Without details of the land area associated with the E2 zoned land it's unclear the actual FSR and its exceedance.

As an example, applying the 1000m² to the E2 zoned land, per the Key Site 6 requirement (dedicated land component for transport infrastructure), the actual site area for which GFA would be calculated for the shop top housing component would be:

- (approx. area of E2 zoned Land) 1000m² – 12720m² (site area subject of SSDA) = 11,720m².
- 60,900m² / 11,720m² = 5.19:1 FSR
 - This is not inclusive of the commercial GFA component.
- Inclusive of the commercial GFA component it is: 5.19 + 0.28 = 5.47:1

Note: the above calculations are subject to the applicant's detailed calculation. The above is provided to aid the applicant as they prepare their EIS and it's the applicants responsibly to undertake detailed GFA testing.

The above calculations indicate that the proposed GFA over the maximum permissible is far higher than stated by the Applicant.

Council notes that this GFA exceedance is a result of a strategic anomaly when the rezoning occurred it did not consider the implications of split zonings would have on detailed development applications.

Council considers that a detailed Clause 4.6 request is needed to justify this matter, particularly noting the above strategic anomaly and its implications on the calculation of GFA. Council would recommend discussing this matter with DPHI prior to submission of any EIS, given the level of exceedance would be significant.

It is recommended on a detailed EIS that:

- A clear GFA schedule is provided that breaks down the site area for which GFA is calculated from.
- The plans clearly nominate the area inclusive of the site that is zoned E2. The applicant may need to undertake detailed zone boundary investigations to accurately determine this.
- A detailed Clause 4.6 request that clearly demonstrates there are sufficient environmental planning grounds to justify the exceedance.

Stormwater Management

RLEP 2014 Clause 6.4 applies to the development. Site is noted to fall to the public road frontage (Giffnock Avenue) and therefore does not present any significant, fundamental concerns concerning drainage of the site.

As per Council's DCP requirements, onsite detention (OSD) must be implemented in the stormwater system. The system must be designed in accordance with the DCP Part 8.2 (*Stormwater and Floodplain Management*) utilising the detailed method (refer to the associated Technical Manual to this DCP Part).

Aside from the detailed controls in the abovementioned Technical Manual, the following key requirements are applicable / to be accounted for:

- The system must be located at the lowest point of the site, close to the discharge point, so as to ensure that the entire development could readily be routed through it.
- The failure mode for the OSD system must be accounted for. This requires consideration for stormwater to surcharge from the detention storage, ensuring there is provision for the safe conveyance of stormwater away from habitable areas, should the discharge line / discharge control be blocked.
- Above ground basins which are landscaped must have the volume increased by 20% to account for landscaping in this area.

The scale of development will warrant WSUD measures be implemented as per Section 3 of the DCP Part 8.2 (*Stormwater and Floodplain Management*). The use of or integration of WSUD elements into the landscaping features of the development is strongly encouraged.

Council recommends that the above is considered as the Applicant prepares their EIS.

Environmental sustainability

RLEP 2014 Clause 6.6 applies to the development as it includes development with greater than 1500m² in a mixed-use zone. The EIS should demonstrate that the requirements of the Clause are incorporated into the project.

Design excellence

RLEP 2014 Clause 6.13 applies to the development. Council notes that the development has obtained a design excellence exemption from the Government Architect, subject to their conditions.

Council is generally supportive of the built form as its expression is vastly different to most major development within Macquarie Park. The built forms rotation provides a unique visual contrast to the buildings in its immediate context. Further advice is provided below.

Macquarie Park Transport Oriented Development Precinct (and Macquarie Park Design Guide)

RLEP 2014 Part 7 applies to the development. The application states that the intention is to design the proposal to be consistent with the provisions of RLEP 2014 including the *Macquarie Park Design Guide*.

Macquarie Park Design Guide

RLEP 2014 Clause 7.3 prescribes that development consent must not be granted to development on the site unless the consent authority is satisfied the development is consistent with the *Macquarie Park Design Guide* (the *Design Guide*) and including the relevant objectives and outcomes. Council's advice below contains discussion on relevant compliance matters within the design guide.

Effect on neighbouring sites

RLEP 2014 Clause 7.4 requires the consent authority to consider the impact development has on isolated sites. Given that part of the development has been developed to its highest and best use for serviced apartments, it's unlikely this part of the site would be considered isolated requiring further assessment under the control.

Affordable housing contributions

RLEP 2014 Clause 7.5 requires development in Macquarie Park that proposes residential accommodation to contribute a portion of the residential GFA as affordable housing dedicated to Council in perpetuity. Control 7.5(2) requires Key Site 6 provide 10% of GFA as affordable housing dedicated to Council.

Council seeks that this affordable housing be provided to Council on detailed application. Council notes that the applicant suggests that affordable housing would be provided at:

- 10% affordable housing (3% in perpetuity and 7% for 15 years).

The applicant is advised that under DPHI's rezoning of Macquarie Park, *DPHI Macquarie Park Affordable Housing Contribution Scheme 2024* requires that the affordable housing be delivered in perpetuity and be dedicated to Council via condition of consent. The applicant's proposal of keeping it within ownership for 15 years, would be inconsistent with the control and not within the intended effect of the rezoning reform. The affordable housing scheme is clear in its requirements that it requires any dedicated affordable housing to be provided in perpetuity. Extracts from the scheme confirm this, such as:

2.2 Dedication of Completed Dwellings

The affordable housing contribution requirement may be satisfied through the dedication of completed dwellings free of cost, and to the satisfaction of Council. The completed dwellings must meet the following requirements:

*Completed dwellings (and land) are **dedicated to Council in perpetuity** and free of cost. Council or its Community Housing Provider will be responsible for rental arrangements. (Emphasis Added)*

The Applicant noted in the meeting that there was a drafting error regarding their specific affordable housing quantum within the rezoning of Macquarie Park and sought to vary Clause 7.5 of the RLEP 2014 with a Clause 4.6 request.

Noting other errors that affect the site, Council seeks that any variations to affordable housing GFA quantum on the site occur through a formal planning proposal process. Council does not support any variations to this control via clause 4.6, as to not set an undesirable precedent for development in Macquarie Park.

Council notes that the control permits a monetary payment in lieu of dedicated affordable housing. Should the applicant not seek to deliver the full 10% affordable housing in perpetuity, the applicant can propose a monetary payment for the balance of affordable housing not dedicated.

The Applicant is to note that the Housing SEPP *Part 2 Development for affordable housing does not apply* to land within identified as an "Accelerated TOD Precinct" (for which Macquarie Park is), in accordance with Clause 15C(2A). The clause states:

15C Development to which division applies

2A) This division does not apply to development on land—

(a) identified as an "Accelerated TOD Precinct" on the Accelerated Transport Oriented Development Precincts Rezoning Areas Map, or

(b) identified as the Warrawong Site on the State Significant Development Sites Map, within the meaning of State Environmental Planning Policy (Planning Systems) 2021, Chapter 2.

Given the above any affordable housing proposed is to be in accordance with Clause 7.5 of the RLEP 2014, that requires affordable housing dedicated to Council in perpetuity and not provided for 15 years.

On detailed EIS submission Council will be seeking that affordable housing be provided in accordance with Clause 7.5 requirements and requiring that DPHI impose a condition of consent requiring the dedication of affordable housing.

Requirements for increased building heights and FSR – Key Site 6

RLEP 2014 *Clause 7.13 Development on land in "Area 6"* permits development in accordance with the incentive provisions if the consent authority is satisfied that there will be adequate provision of recreation and access network infrastructure.

As the development seeks to utilise the incentive provisions of Key Site 6, to utilise these incentives the applicant will need to engage Council with a Voluntary Planning Agreement (VPA). It's noted that Key Site 6 requires the following public benefit:

- (a) is satisfied that at least 3,025m² of the site area will be used for the purposes of a single recreation area, and*
- (b) is satisfied that at least 1,000m² of the site area will be used for the purposes of road infrastructure facilities, and*

Council notes that no draft letter of offer has been provided to Council for review. As Key Site 6 requires the dedication of land, the mechanism to facilitate the dedication of this land is a VPA with Council. Council encourages early communication on the terms of the VPA to ensure it doesn't unnecessarily delay the assessment of the SSD.

Further discussions are required to be held on this matter and the Applicant is to separately reach out to the contributions co-ordinator to discuss the public benefit offer proposed.

A detailed EIS must be accompanied by a draft letter of offer. Should the Applicant seek to discuss this with Council prior to EIS submission, please reach out to Nic Najjar in the first instance to facilitate these discussions.

Comment on potential public benefit offer

As noted above, no draft offer has been provided to Council for review. Council suggests that any offer consider:

- The proposal must provide for the embellishment and dedication at least 3,025m² of land to Council for open space.
- The land must be embellished prior to dedication to Council. Dedication is required prior to the issue of any Occupation Certificate on the site.
- The application must also dedicate approximately 4.5m of land to Council along the Hyundai Drive frontage.

Land Dedication to TfNSW

It's noted that 1,000m² of the site is to be dedicated to Transport for NSW (TfNSW) to accommodate the future pedestrian bridge across Lane Cove Road. The Applicant is encouraged to have discussions with TfNSW regarding this land dedication. Note Council's advice below regarding the configuration of the land dedication for the pedestrian bridge.

Additionally, Council notes that currently under assessment is SSD-63168959 (NEXTDC S5 Data Centre) which has the corresponding land dedication to TfNSW for the pedestrian bridge.

It's recommended to engage with the Applicant for SSD-63168959 in respect of aligning the space on both parcels of land for the bridge to land (being delivered by others).

Developer Contributions

Council notes that the *Macquarie Park Corridor Section 7.12 Local Infrastructure Contributions Plan April 2025* will apply to the development.

On submission of the EIS the Applicant is to provide a detailed Quantity Surveyor (QS) report to Council as its required to calculate the contribution under the 7.12 Plan that apply a 4% contribution on development cost to Council. Council requires that a detailed QS report be provided to enable the Council to calculate the 7.12 contribution condition for DPHI.

The QS report can be provided to Council under separate cover and be kept commercial in confidence.

Ryde Development Control Plan 2014

The site is located within the Macquarie Park Precinct, as such the controls of *Section 4.5 Macquarie Park Corridor of the Ryde Development Control Plan 2014* would apply. The EIS should demonstrate consistency with the RDCP requirements.

Note: It is acknowledged that the *Design Guide* prevails to the extent of any inconsistency between the *Design Guide* and the DCP. *Section 2.10 of the Planning Systems SEPP* prescribes that DCP's do not apply to state significant development.

Comments/issues raised by Council's Pre-lodgement Panel

A pre-EIS meeting was held with Council on 5 June 2025 and Council's preliminary comments provided. This advice provides additional comments and issues that the Applicant needs to address prior to the lodgement of any application. Given the preliminary nature of the details provided, it should be noted that the following does not constitute a full exhaustive list of all applicable requirements. The following matters are included for the proponent's consideration:

- *Urban Design*
- *Strategic Transport and Parking reliance*
- *Drainage*
- *Traffic*
- *Public Domain*
- *Waste Management*
- *Affordable housing distribution and Amenity*

Urban Design

a) Ground plane and through site link

The revised ground plane with a through site link which is open to sky enhances permeability and connectivity for the proposed dedicated open space and the site. Further consideration to how this connects the wider pedestrian network is required, as well as open sight lines through to the link. Additional drawings are required to illustrate the dimensions and sections of the through site link.

It is recommended that the Applicant demonstrates how the through site link contributes to the pedestrian network, particularly the connection to the metro station and west-east active transport corridor via the proposed footbridge.

b) Built form and scale

The reduced floorplate of Tower A is supported. However, due to the revised configuration and building heights with both towers having similar heights, Council has raised concerns about potential wind effects on the public domain and the through site link.

Demonstrate the proposed building bulk, separation, height distribution and scale meet design excellence requirements with the required quality and quantity of amenity. A slender tower form is encouraged.

A wind assessment is required on EIS submission to demonstrate the mitigated impacts on the public domain and the through site link. It is noted that wind assessment not included in the Industry Specific SEARs. Macquarie Park is subject to significant wind impact and large buildings required detailed assessments (pedestrian environment and wind tunnel studies) as per the Ryde DCP 4.5 Macquarie Park Section 9.1.

c) Childcare centre

The proposed childcare centre is accessed from Hyundai Drive, with its main entry located adjacent to the parking and loading access. This arrangement lacks adequate design consideration for safe and efficient drop-off and pick-up activities.

The proposed childcare floor space on Level 1 appears to be potentially constrained by the centrally located residential core, along with an additional core for the childcare itself. The rooftop outdoor play area may present potential privacy and acoustic issues in relation to the adjacent open space and nearby residential towers.

It is recommended that the proposal be revisited to ensure the childcare centre is well-located and designed, providing required amenities for all users and residents. This should include exploring alternative options to locate the childcare at ground level, with a separate, safe and convenient entry.

d) Public Art

The site is identified as “Lots to respond to public art opportunity” in the Design Guide. Ryde DCP and Ryde Public Art Planning Guide for Developers both have specific requirements for public art. Council notes the applicant presented their draft landscape concept for the precinct which included detailed public art offerings. The arrangement and presentation of public art throughout the urban plaza and fronting the proposed park is supported.

e) Public domain interface

Concerns are raised in relation to privacy issues related to the residential uses on the lower levels of the eastern façade of Tower A, which interface with the elevated footbridge. It is recommended that the proposal be revisited to explore commercial or communal uses interface with the dedicated infrastructure area to mitigate the privacy issue.

Strategic Transport and Parking reliance

Strategic Transport

The development includes significant parking for the residential component, when the site is “well-located” and is within a Transport Orientated Development (TOD) area. The rezoning of Macquarie Park did not contemplate parking rates that would be suitable for a TOD area and Council's current planning controls for parking are more than 10 years old and do not align with contemporary planning practices as it relates to planning for parking in a TOD area.

Council's DCP 9.3 parking rates within Macquarie Corridor is for commercial development and the parking rates provided for residential development under section 2.2 does not contemplate parking provisions for residential development (Build to Sell) within Macquarie Park Precinct, it is considered not relevant.

Due to the proximity to public transport options (Metro Station) and the foreseeable traffic capacity issues associated with surrounding road intersections, it is strongly recommended that the development minimise the degree of off-street parking provided to residents. Conversely the parking allocation for residential visitors should be maximised given the very low capacity for casual on-street parking. Based on review of DPHI rezoning of other TOD Area's, the respective design guides for these areas did include parking rates for residential development in the accelerated TOD areas. In review of the 8 accelerated TOD Areas Macquarie Park was the only TOD Area to not have parking controls included in its Design Guide, it is unclear as to why this was the cases.

Council considers that the EIS must undertake a comparative analysis of parking in similar TOD (Figure 5) areas and determine a suitable parking rate that can service the development, whilst reducing reliance on parking. To be clear the EIS should provide less parking than what it outlined in DCP 9.3 and what is currently proposed.

Table 7: Car Parking Rates for Residential Flat Buildings and Residential Component of Shop Top Housing

Apartment size	Maximum car parking rates (per dwelling)
Studio	0.3
1 bedroom	0.4
2 bedroom	0.7
3+ bedroom	1

Figure 5: Extract of Table 7 showing Maximum Parking Rates (Source: Crows Nest TOD Design Guide)

Council also recommends that the EIS provide the following information:

- A Transport Impact Assessment be provided that includes a Green Travel Plan. This is to demonstrate how the development will minimise private vehicle travel and congestion and in turn promote active, public and shared transport alternatives, in line with the broad aims of Ryde Integrated Transport Strategy.
- Plans should show details of not just regular car parking but also carshare spaces, end of trip facilities and bicycle and motorcycle parking.
- The reliance on a mechanical turntable for loading vehicles is not recommended, a second entry/exit should be provided for the car park, and the pedestrian/cyclist bridge over Lane Cove Rd should include provision for more direct access to/from Lane Cove Rd, not just to/from Drake Avenue.

Other Parking Matters

With respect to the retail component, the parking controls for the DCP provide no alternate rate for retail development in the Macquarie Park area and therefore the minimum 1 parking space per 25m² would be applicable.

The provided non-residential GFA area given as 3553m², this would yield a warrant for 143 parking spaces. The proposal is noted to supply only 100 spaces. This undersupply does not present great concern however as it is foreseeable that the retail uses would be ancillary to residents in the development and, that the undersupply of parking is aligned with the transport objectives for the Macquarie Park corridor as such the undersupply is considered acceptable. Its recommended to adequately justify this matter in the EIS.

Drainage

The current Council flood maps indicate that the site is inundated by PMF flood as shown in Figure 6. Council seeks that the design of the building responds to Council's flood planning controls, and provides the following recommendations to be addressed in the EIS:

- A certificate from a flood engineer confirming that the proposed basement openings will not be inundated during PMF flood event.
- Basement Ramp to raise to PMF level before descending to the basement to ensure basement flood immunity.
- Any other opening leading to the basement (e.g. emergency exits, vents, etc.) are to be located above the PMF.
- A cross section of the basement ramp is to be provided and clearly demonstrating that the crest of the basement ramp is designed up to PMF level.
- A detailed stormwater management plan is to be provided, clearly outlining the proposed drainage method for the development site.
- Drainage network capacity analysis must be demonstrated to ensure the proposed development can be effectively drained and managed via the downstream drainage network.



Figure 6: PMF flood mapping (Source: Ryde Maps)

Traffic

Council as considered the development from a traffic perspective and provides the following feedback to be considered in the EIS:

- 1) **Traffic Impact Assessment:** A comprehensive traffic impact assessment report is required, in accordance with the NSW Guide to Traffic Impact Assessment Guideline (Version 1.1, November 2024). The report must address the following key issues .
- 2) **Parking Provisions:** Based on the minimum parking rates for 10% affordable housing required by SEPP and the maximum parking rate regulations of the Development Control Plan (DCP), approximately 24 residential parking spaces could be removed.
- 3) **Car Park Access Driveways:** Given the scale of the proposed 795 parking spaces, it is recommended that the car park be served by at least two separate two-way access driveways to better distribute site-generated traffic across the surrounding road network.
- 4) **Retail Access Driveway:** It is preferable for the retail access driveway to be located off Hyundai Drive.
- 5) **Childcare Pickup/Drop-off Arrangements:** The proposed childcare pickup and drop-off area must accommodate vehicles approaching from both directions, rather than solely from the one-way Hyundai Drive. The design should ensure a smooth traffic flow and prioritise safety for pickup and drop-off activities.
- 6) **Hyundai Drive Widening:** The road design scheme for widening Hyundai Drive including layout and conceptual linemarking/signage are required in the DA submission.
- 7) **SIDRA Network Modelling:** A SIDRA network model is required to evaluate the traffic impacts of the proposed development on the following intersections:
 - Waterloo Road/Lane Cove Road
 - Hyundai Drive/Lane Cove Road
 - Waterloo Road/Coolinga Street
 - Coolinga Street/Giffnock Avenue/Kitty Street

The base year model must be calibrated using traffic counts no older than 2025. A future year model should forecast traffic conditions five years post-development completion, utilising background traffic forecasts from Transport for NSW's Strategic Traffic Forecasting Model (STFM). Mitigation measures must be proposed if the operational performance of assessed intersections falls below Level of Service (LOS) D.

- 8) **Non-Car Mode Trip Assessment:** In line with the NSW Guide to Traffic Impact Assessment, an estimation of person trips generated by the development and an assessment of its impact on all transport modes are required. This includes evaluating the safety and efficiency of pedestrian/bicycle routes connecting the site to surrounding bus stops, the metro station and retail outlets. Potential pedestrian crossings on surrounding roads may need to be considered.

The proposed site entries for pedestrians are to be closer to metro station and bus stop as much as possible.

- 9) **Loading Dock Bays:** Based on outputs from the Transport for NSW Urban Freight Forecasting Model, the development should provide the following loading bays:

- Two Heavy Rigid Vehicle (HRV) bays
- Three Small Rigid Vehicle (SRV) bays
- Six standard car parking bays for vans, utilities, and other B99-sized maintenance vehicles.

- 10) **Shared-User Path Bridge:** The proposed shared-use path bridge within the southeast corner of the site is recommended to connect with the Drake Avenue cycleway and footpath, as well as share user paths along western side of Lane Cove Road. The proposed bridge ramp is only connected with Drake Avenue, which is inconvenient for pedestrians and cyclists coming from south/north along Lane Cove Road, particularly those coming from northern Metro Station.

Public Domain

a) Scope of Public Domain Works

The proposed development has frontages to Lane Cove Road, Hyundai Drive, Giffnock Avenue and Kitty Street. Required public domain upgrade works along these frontages include, but are not necessarily limited to:

- Road pavement upgrades,
- Installation of new street lighting – Multi –Function Poles.
- Granite footpaths
- Shared user paths
- Parking bays
- Parking sensors
- Parking meters
- Street trees and pits
- Stormwater management upgrades
- Bus stop and bus shelter upgrades.
- Street furniture
- Kerb and gutter
- Kerb ramps
- Utility asset adjustment to facilitate works
- Traffic management infrastructure
- Removal of any existing encroachments onto Council land
- Retaining structures required to facilitate any proposed level differences between public and private land (retaining structures are to be wholly within private land).

The EIS is to include details of the public domain works identified above.

Directly adjoining the site, a new road reserve is to be delivered as part of the works on the neighbouring Key Site 5. The new road is required to be a 20m wide 'Secondary Circulation Route' as per the arrangement specified as 'ST7' in the Updated Design Guide.

To ensure the subject site can benefit from any future Road proposed on Key Site 5 and that the levels associated with this road can adequately service the applicant's site, it is recommended to engage with this landowner.

c) Dedication of Land for Pedestrian Bridge

The proposed layout of the land dedication to facilitate the bridge is shown Figure 7. The proposed arrangement shows a loop road within an almost square area of land. The proposed access is only from Drake Avenue, with access directly from the Metro not being preferable. It is also noted that part of the proposed bridge approach is on the neighbouring property – Key Site 5 which would not be delivered until after the operation of the subject site.

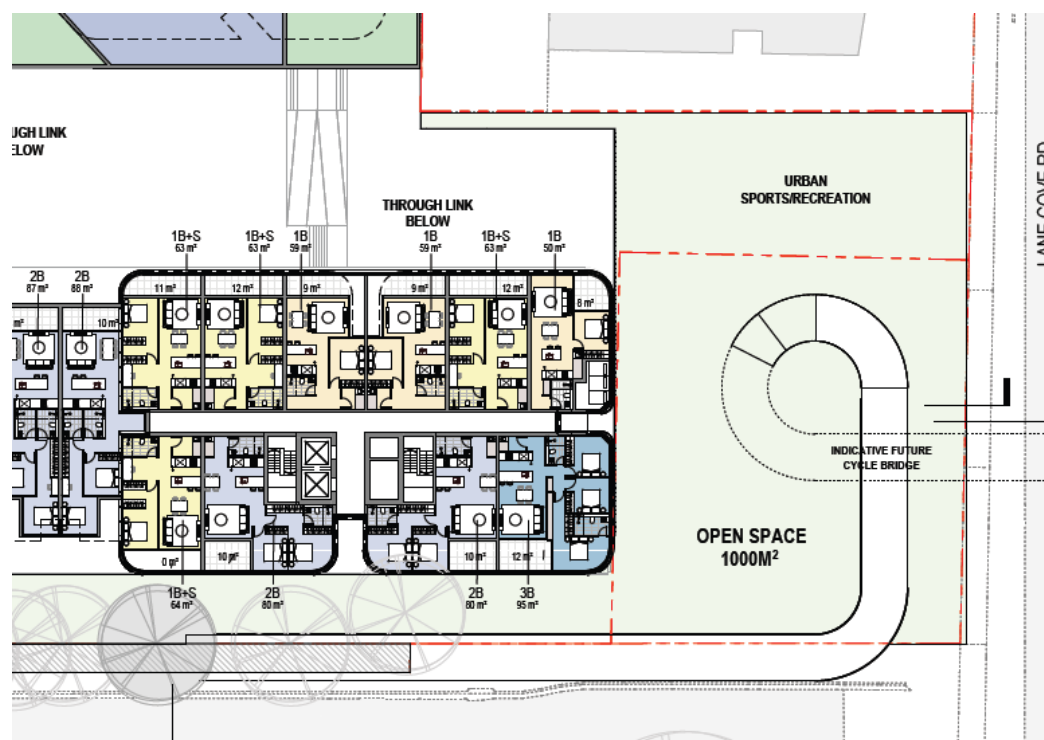


Figure 7: Extract showing pedestrian bridge link (Source: Studio.SC)

The above arrangement is not considered to provide for the optimal access arrangements, both in terms of the distance in travel required to and from the Metro Station to access it and also in terms of gradient. To be of maximum utility to the public the bridge should provide convenient access to and from the Metro Station and other important high-volume areas and be easy to use for cyclists and pedestrians by being of an adequate gradient.

The Lachlan's Line overpass (Figure 8) providing access to the North Ryde Metro Station is a good example of a bridge which achieves the requirements of convenient and high utility for the community. Some other bridges such as the one crossing King Georges Road at Wiley Park (Figure 9) provide for limited utility as the community have to travel long distances to on back and forth ramps.



Figure 8: View of pedestrian/cycle bridge over Delhi Road (Source: Google maps)



Figure 9: King Georges Road at Wiley Park pedestrian ramp and Bridge (Source: Google maps)

There is an opportunity to amend the dedication area to provide for better access to Macquarie Park Metro Station while also providing shallower grades which will be more preferable to pedestrians and cyclists.

The amended arrangement below (Figure 10) shows an L-shaped dedication areas, facilitating dual access ramps from both Lane Cove Road and Drake Avenue. This amended arrangement would enable direct access between the Metro Station and the overpass which would likely greatly improve the community utility of the bridge.

It's recommended to explore different dedication scenarios to ensure that the future design of the pedestrian bridge adequately services the community. This arrangement should be discussed with TfNSW as the authority the land is to be dedicated too.

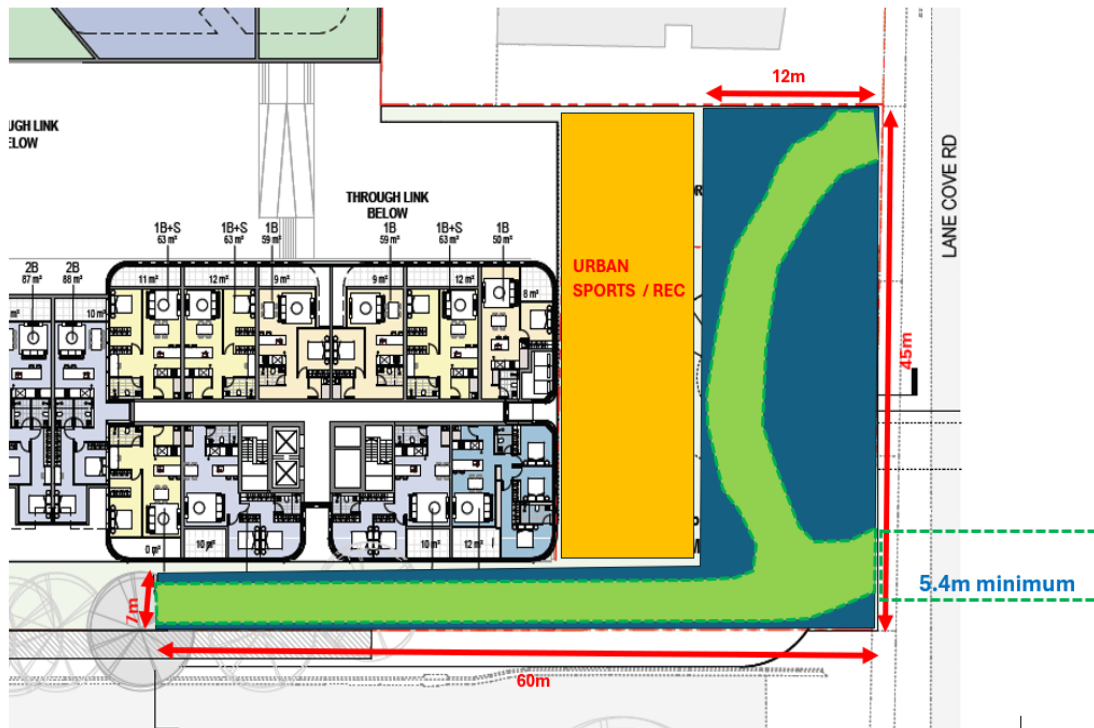


Figure 10: Sketch showing potential amended design of pedestrian bridge (Base Source: Studio.SC)

d) Provision for Future Subsurface Communications Infrastructure

The site is in proximity to the data centre located at 6-8 Giffnock Avenue and there is a current development application under assessment for a larger data centre development at 269 Lane Cove Road directly across the road from the site. Council's experience with data centres in Macquarie Park has been that they result in the installation of large volumes of subsurface communications infrastructure, within their broad vicinity, for a number of years following the commencement of operation.

These installations, often involve consistent trenching of public domain infrastructure, usually footways in busy pedestrian thoroughfares. These activities accelerate the dilapidation of Council infrastructure and often result in Council footpaths being in a constant state of temporary restoration.

To prevent this issue Council requires the provision of spare conduits installed to provide future non-destructive installation along the site frontages by communications utility authorities. Studies by Council has demonstrated that Council footpaths have been trench up to 10 times in particular locations surrounding data centres within 6 years of the commencement of operation of new data centres.

As a result Council will request the installation of 8 new spare conduits beneath the new footways along the site frontages in order to facilitate non-destructive future installations. Final specifications, arrangement and depth will be subject to further consultation with communications utility authorities.

e) Dedication of Land for Road Widening Along Hyundai Drive

As specified by the Updated Design Guide issued by DPHI, dedication of land (Figure 11) will be required to facilitate road widening in Hyundai Drive to a 14.5m (wide local street, denoted as "ST10" within figure 4a – Street Network Map).

Council requires full depth, half road width reconstruction of roads along the frontage of development frontage, however, upon inspection at the end of the development works a more appropriate scope of works may be agreed by Council.



Figure 11: Marked up plan showing dedication of land required to facilitate the widening of Hyundai Drive

f) Additional Information Required

The following additional information is required on EIS submission:

- A public domain concept plan detailing the full extent of public domain works addressing the requirements of the Updated Design Guide issued by DPHI and any issues raised by Council.
- Updated plans should incorporate consideration of the interface between the subject site and Key Site 5 where a new 20m Secondary Circulation Route will be dedicated to Council at the location and alignment of Drake Avenue. The existing level difference of several metres is not an ideal interface between residential/ commercial uses proposed for the site and a future road reserve. Provide details on any proposed pedestrian connections between the site and future road through Key Site 5.
- Public domain concept plans should denote the installation of eight spare subsurface communications conduits to facilitate future non-destructive along all development frontages to be upgraded.
 - The installation of spare conduits is to form part of the public domain upgrade works and be handed over to Council upon completion.
 - The provision of spare conduits will have a direct benefit for occupants of the developments in the form of less disruption and less dilapidation of public domain infrastructure.
 - Final details of the spare conduit installations, including depth, size, alignment etc will be subject to review of existing sub-surface infrastructure and detailed information should be provided for Council endorsement, prior to approval under the Roads Act.
- The plans provided show a 1000m² land dedication to facilitate the delivery of a future pedestrian / cyclist bridge spanning Lane Cove Road. It is acknowledged that the arrangement shown in the initial plans reproduces the arrangement shown in the Design Guide issued by DPHI, however, this arrangement does not appear to provide for maximum community utility as the route from the northern Metro Station access

point to the location of the proposed future ramp is prohibitively long. It is considered critical that the land dedication footprint facilitate future delivery of an overpass which provides for direct access between the Lane Cove Road footpath and the overpass ramp to prevent the overpass having limited community utility. Subject to consultation with TfNSW and DPHI, the revised plans should incorporate alternate dedication arrangements that would facilitate more direct access to the Macquarie Park Metro station.

- Include details of the required land dedication along the Hyundai Drive frontage of the site to facilitate a 14.5m width local road reserve as per the requirements of the Design Guide.

Waste Management

The tabled documents do not provide sufficient information into proposed waste servicing and access. A preliminary operational waste management plan and detail in relation to proposed access to loading bays is necessary to ensure the site can operate safely and efficiently.

Due to the significant number of residential units proposed, a strategic loading dock and waste collection scheme must be provided in accordance with Council's Development Control Plan 7.2 Waste Minimisation and Management as it reflects Council's contractual servicing requirements. Council does not permit the use of private contractors for residential waste collection.

Council provides the below waste advice for the applicant to consider and address on EIS Submission:

a) Onsite Loading

- Onsite loading must be provided for forward entry and exit for heavy rigid waste collection vehicles to AS2890.02 (12.5m long with a 4.5m headroom clearance).
- Swept paths and AutoCAD DWG files must be provided demonstrating vertical and horizontal clearance for each site.
- Council requires loading areas to be co-located with bin and bulky waste storage areas without transfer across driveways to ensure safe and efficient loading.
- All loading areas must be suitably designed to accommodate a HRV with line marking and sign positing. Loading bays must not obstruct pedestrian and vehicle throughfares.

b) Provision of Adequate and Separated Waste Rooms

- Waste and Recycling chutes require separate hoppers on each residential level with additional space for a Food Organic bin.
- Each residential chute room must be large enough for bins to be easily rotated and accessed.
- Chute discharge rooms must be restricted to resident access and be suitably caged.
- Bin transfer aids (bin lifts/bin tugs) must be utilised for bins traveling greater than 10m or gradients 1:24. This applies for waste discharging on different levels than where waste is collected.
- Separated waste rooms must be provided for residential and commercial uses.
- Additional space must be provided for retail tenancies producing food waste in accordance with the NSW FOGO Mandate 2030.
- Main waste rooms (separated) must open directly onto the loading area to support safe and efficient servicing.
- Bulky waste storage rooms (separated) must open directly onto the loading area, no further than 15m from the rear of the waste collection vehicle.
- All doorways and bin travel paths must be wide enough to accommodate the largest bin required and not exceed a gradient of 1:24.

c) Updated Waste Generation Rates & Waste Management

- A Waste Management Plan is required to detail how waste will be managed onsite, responsibilities of building management, and accurate generation rates as stipulated by Council.
- Non-Residential uses must utilise waste generations as outlined by the EPA Better Practice Guide for Resource Recovery in Residential Developments 2019. This includes food/takeaway and retail.
- Residential units must utilise the following generation:
 - 120L per unit for recycling collected twice (2) weekly in 660L bins
 - 120L per unit for waste collected thrice (3) weekly in 1100L bins
 - 25L per unit for food waste collected in 240L bins
 - Both Commercial and Residential uses require bulky waste storage per site. Residential portions must utilise a sliding scale being a minimum of 5m² for 30 or less units and 8m² +1m² per additional 20 units for sites with more than 30 units.
- Council does not permit the private waste collection of domestically rated/residential units.
- Building manager/caretakers must be responsible for onsite waste management and transfer of bins from the storage area to the nominated collection point. Council only services and access full bins presented to the nominated collection point.

Affordable housing distribution and Amenity

Noting Council's advise regarding dedication of Affordable Housing in accordance with Clause 7.5 of the RLEP 2014, Council requires that any affordable housing dedicated to Council contains equal access to amenity that other market apartments would.

Council supports the provision of affordable housing and recognized its value, however recently Council has been subject to complaints and inquiries from occupants of these approved social housing developments requesting Council considers the amenity afforded to these units as these occupants are suffering from the poor living conditions by virtue of inferior design outcomes.

Council has seen that these units are provided the least amount of amenity in the entire block and are subject to significant impacts. Simply allocating the most amenity impacted units within a complex to be used as affordable housing as its "affordable" isn't supported. Occupants of the affordable housing should be afforded the same rights and respect as others in an equitable manner.

A suitable range of affordable units that are balanced throughout the tower and are afforded a reasonable amount of amenity is required. At minimum the affordable housing units should be evenly spread throughout the complex (across multiple levels of the building) and that each of these units have sufficient access to solar and ventilation complying with one or both requirements under the ADG.

It's recommended that:

- Affordable housing units are evenly spread throughout the building (multiple levels)
- A reasonable amount of affordable housing units achieves compliant solar access and natural ventilation with these units at minimum complying with one or both of the ADG solar and ventilation requirements.

OUTCOMES and SSDA Lodgement Requirements

Council thanks the Applicant for engaging early on the design and the outcomes proposed on the site. Council appreciates early engagements on State Significant Applications. This advice contains technical advice on detailed application matters that will assist the Applicant in preparing their EIS.

The advice contained within this report should be considered in conjunction with the issued SEARs for the development. Council recommends that any EIS submitted consider this advice and amend the design/ provide evidence with the EIS to address these issues.

Council thanks you for choosing to engage with us for formal Pre-Environmental Impact Statement Advice.

If you require any additional information regarding this matter, please contact Nic Najar- Acting Senior Co-Ordinator Development Advisory Service on 0403 215 603 or email to NicholasNa@ryde.nsw.gov.au

Yours sincerely



Nicholas Najar
Acting Senior Co-Ordinator
Development Advisory Services.

End of advice