

# ATTACHMENT 1

## City of Ryde Submission 96 Anzac Avenue West Ryde- SSD-81610714

Concurrent Rezoning & Construction of 18-22-storey development, comprising 145 residential apartments, including affordable housing (3% of residential GFA / 4 dwellings) for 15 years, 29 co-living rooms across levels 1-3, four (4) retail tenancies at ground level, three (3) level basement car park, as well as podium car parking, for 195 car parking spaces (including 17 accessible spaces), 6 motorcycle parking spaces, 57 bicycle parking spaces and loading dock facilities.

**Council File reference: COR2025/228**  
**Submission Date: 26 February 2026**

## EXECUTIVE SUMMARY

### Introduction

Thank you for inviting City of Ryde Council to comment on the proposed SSD at 96 Anzac Avenue West Ryde SSD-81610714.

The SSD Application seeks approval for the development of the above site, including concurrent rezoning.

Specifically, the application involves:

### Amendment to RLEP2014

- Increase the maximum permitted building height from 15.5m to 80.5m.
- Increase the maximum permitted floor space ratio from 1.25:1 to 5.36:1
- Maintain the existing MU1 Mixed Use zoning.

### SSDA

- Site preparation works including demolition of existing improvements and structures on site, bulk excavation and tree removal.
- Construction and operation of an 18-22-storey shop top housing development, comprising:
  - 145 residential apartments, including affordable housing (3% of residential GFA / 4 dwellings) to be managed by Whitechapel Community Housing for 15 years.
  - 29 co-living rooms across levels 1-3.
  - Ground floor residential lobby and separate co-living residential lobby.
  - Four (4) retail tenancies at ground level providing active street frontages along Victoria Road and Anzac Avenue.
  - Communal living space servicing the co-living rooms.
  - Communal open space located at levels 4, 18 and 22 for the residential apartments and levels 2-3 for the co-living facility.
- Landscaping and public domain works, including:
  - New trees at street level, deep soil planting and façade edge planting.
  - Inclusion of podium and rooftop terraces and landscaping.
- Construction of a three (3) level basement car park, as well as the inclusion of podium car parking, which is sleeved through façade articulation, comprising:
  - 195 car parking spaces (including 17 accessible spaces).
  - 6 motorcycle parking spaces.
  - 57 bicycle parking spaces.
  - Loading dock facilities.
- Vehicular access from Anzac Avenue using the existing shared access easement to the north-west of the site.

## **Summary of Key Issues**

In review of the Environmental Impact Statement (EIS) and supporting documentation several issues have been identified by Council staff. The key issues identified with the SSD proposal is summarised below (and detailed later in the submission):

### **Does not Identify or Address the Local Infrastructure Impacts of the Proposal.**

Local infrastructure in the City of Ryde is at capacity. The SSD does not adequately demonstrate or address the impact on local infrastructure. The EIS relies heavily on existing utilities and services but does not address local infrastructure demand nor the cumulative impacts from the development, particularly in relation to open space and recreation.

The SSD does not address the SEARS request for a social impact study and is inconsistent with DPHI's State Significant Development Guidelines which require infrastructure impacts to be addressed in Part 3.3 Strategic Context, and Part 3.7 Assessment and Mitigation of Impacts.

### **Affordable Housing**

Given the substantial uplift proposed, the offer of only four affordable housing dwellings, and for a limited period of just 15 years, is considered inadequate and largely symbolic. Council strongly objects to this approach and requests that the affordable housing provision be consistent with Council's Draft Key Workers Affordable Housing Policy 2025, with dwellings secured in perpetuity. An increased quantum of affordable housing is also required.

### **Public Benefit Offer (to upgrade a pedestrian crossing) is Inadequate**

The appended public benefit document in the EIS proposes to upgrade the existing pedestrian crossing directly fronting the site. This upgrade would be needed as a direct result of the proposed SSD for pedestrian safety. A more meaningful and genuine public benefit offer should be provided to address the local infrastructure impacts commensurate with the cost of addressing the local infrastructure demands generated by this proposal which is estimated to be around \$6,567,000.

### **Strategic Merits and Justification for increase in height & FSR**

The Application lacks justification for the significant height and FSR being sought under the application.

### **Waste Management Issues**

The proposed development has several waste access issues. The proposal requires reversing across a vehicle thoroughfare. There is a lack of clearance over bulky items storage area. The loading dock, travel paths (contain steps) and servicing area require revised arrangement.

## **Stormwater Management Engineering Issues**

The stormwater management configuration does not address the failure mode, in the event of blockage. Surcharge flows will inundate neighbouring lots. Additionally, the design of the OSD system has not considered the potential for a submerged outlet during extreme storm events.

## **Building Design Issues**

Parking is proposed above ground, resulting in enlarged podium floorplate. Design limits provision of deep soil zone. Podium design, overshadowing impact and inadequate setbacks are other relevant issues.

## **Traffic Matters**

The proposed development will require several upgrades to road, cycling and pedestrian facilities as part of development to achieve acceptable level of safety and improved infrastructure.

In addition, 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.

## **Access and Parking**

No parking is being allocated to the Co-living units. Similarly, the development under allocates the retail parking allocation by 10 spaces, providing only 15 of the 25 spaces required. The development is noted to provide a relatively high number of tandem spaces to be allocated for the resident component.

## **Open Space**

The proposal is likely to increase demand on ANZAC Park and the surrounding public domain. The scale of the development, including apartments and co-living accommodation, will increase the local population within walking distance of the park, and it is reasonable to expect greater reliance on the park for passive recreation and informal use. This will place additional pressure on turf, park assets, seating, pathways and maintenance services.

## **Public Domain**

Several required upgrades have been identified including removal of redundant driveway, upgrade to footpath and street lighting.

## **Environmental Health Issues**

The Natural Ventilation Design Review Letter appears to require bedroom window to be open to enable/ meet natural cross ventilation potential. This is in direct conflict with the acoustic report in that all windows must be closed to meet noise requirements

**The relevant issues with respect to SSD-81610714 have been detailed below:**

**1. Lack of Infrastructure & Infrastructure Impact/ Demands not addressed**

The SSD seeks approval for a concurrent rezoning and a mixed-use development to:

- Increase the maximum height of building from 15.5m to 80.5m;
- Increase the FSR from 1.25:1 to 5.36:1.

The application proposes a total of 174 units and 16,877m<sup>2</sup> of GFA comprising 14,923m<sup>2</sup> of residential floorspace (145 units), 1,345m<sup>2</sup> of co-living floorspace (29 units) and 609m<sup>2</sup> of non-residential floorspace.

The SSD proposal seeks a significant uplift compared to what is permitted under RLEP2014 resulting in a significant impact on the existing infrastructure. However, the SSDA does not adequately demonstrate site specific merit as it does not identify or address the local infrastructure impacts of the proposal. The EIS relies heavily on the site's proximity to West Ryde Station and existing utilities services but does not address local infrastructure demand nor the cumulative impacts from the development, particularly in relation to road upgrades, pedestrian links, open space and recreation.

The SSD does not address the SEARS request for a social impact study and is inconsistent with DPHI's State Significant Development Guidelines which require infrastructure impacts to be addressed in Part 3.3 Strategic Context, and Part 3.7 Assessment and Mitigation of Impacts.

Page 46 of EIS and Rezoning Report claims that the proposed development provides accessible open space to both the public and private residents of the area, without providing justifications for the claim. In considering the demand for open space and social infrastructure, the cumulative impact from potential development permitted under NSW Government Low and Mid-Rise Housing Policy for the area should also be considered.

Regarding cumulative impacts, the EIS states, "there are no nearby future proposals likely to result in cumulative impacts on the site". This does not account for the Planning Proposal currently under assessment for the Ryde Eastwood Leagues Club (250m north of the site), or the significant additional growth anticipated under the recently gazetted LMR areas and other HDA determinations (or in the pipeline) within the LGA. This represents an additional 9,833 dwellings (approximately 24,500 people) not included in Council's infrastructure demand modelling.

Local infrastructure in the City of Ryde is at capacity. The Review of Supply and Demand for Sports Facilities in the NSROC Region 2023 identified a projected shortfall of 222 hectares of land by 2036, with 41.7 hectares of this within the City of Ryde LGA. The Ryde Open Space Future Provision Strategy 2021 identifies that the City of Ryde is projected to have a deficit of 13 full-size playing fields by 2036.

The Ryde Section 7.11 Contributions Plan 2020 (7.11 Plan) applies to the land. This plan

levies a contribution for the provision of infrastructure to support the anticipated growth in the LGA (outside of Macquarie Park), being an additional 20,000 dwellings to 2036. The 7.11 Plan does not account for the 3,209 dwellings in the recently designated LMR areas, or the 6,624 dwellings determined under the HDA since December 2025.

The 7.11 Plan is also subject to the Ministerial Direction which caps contributions at \$20,000 per dwelling. This limits the contributions that Council can collect to address the existing and projected infrastructure demands.

The uncapped indexed contribution rate for a 3-bed dwelling in the 7.11 Plan is \$29,606. If this capped rate in the 7.11 Plan is applied to the 174 dwellings proposed under this SSD, it amounts to an infrastructure shortfall of \$1,671,444.

However, the SSD seeks a development outcome that is significantly beyond the infrastructure anticipated within the 7.11 Plan. As such, even the uncapped rate in the 7.11 Plan does not address the infrastructure requirements of the SSD.

Council's Local Infrastructure Strategy 2024 identifies infrastructure demand benchmarks. An assessment of the SSD against these benchmarks identifies that the proposal generates demand for, amongst other things, approximately 11% of a full-size playing field and 15% of a local park. These cumulative infrastructure impacts cannot be ignored and must be addressed by the SSD.

The cost of addressing the local infrastructure demands generated by this proposal is \$6,567,000. This is equivalent to a contribution rate of \$38,000 per dwelling. If the SSD is approved as submitted, it will result in an infrastructure shortfall of \$3,132,000 for the City of Ryde community. This is unacceptable. The application must be updated to adequately address the anticipated local infrastructure requirements of the proposal.

A public benefit offer has been appended to the EIS. This offer has **not been** separately submitted to Council. The offer proposes to upgrade the existing pedestrian crossing directly fronting the development site on Anzac Avenue, to a raised pedestrian crossing. The need for this upgrade is a direct result of the proposed SSD and must be delivered as part of this development. It does not represent an additional public benefit and must be imposed as a condition of consent. Council estimates that this upgrade will cost approximately \$178,000 and is significantly below the \$6,567,000 required to address local infrastructure impacts. The offer is completely inappropriate for the scale of the proposed development and is supported by Council. A genuine public benefit offer should be provided to address the local infrastructure impacts of the proposal.

## **2. Strategic Merits and Justification for proposed increase in height & FSR**

The proposed amendments to Ryde LEP include increasing the maximum Height of Building from 15.5m to 80.5m and increasing the maximum Floor Space Ratio from 1.25:1 to 5.36:1. If approved, the development will result in the tallest building with the highest FSR in West Ryde and Meadowbank area. It is out of scale with the surrounding predominately 4-5 storey mixed use/residential development. The proposed density controls are also significantly higher than other recent development proposals in the area:

- Ryde Eastwood Leagues Club (Planning Proposal): Proposed maximum HOB of 52m and maximum FSR of 4.5:1 to facilitate a 12-storey development (Note that this proposal is not public yet).
- 71-75 Constitution Road, West Ryde (HDA): Proposed maximum HOB of 66m and maximum FSR of 3.65:1 to facilitate development of 10 and 18 storeys towers (Page 21 of EIS and Rezoning Report)

The intention to intensify site and provide additional residential development is supported. This aligns with the *Greater Sydney Plan*, *North District Plan* and *Ryde Local Strategic Planning Statement* to deliver increased level of residential development within walking distance from centres and public transportation. However, the proposed level of uplift is not sufficiently justified. The proposed controls are a significant departure from existing and proposed development in the area. It also does not align with relevant NSW policies, Council policies and previous master planning works done by Council (discussed in next section).

- West Ryde station has the potential for facilitating Transport Oriented Development (TOD) given the frequent services it provides. While not being one of the identified stations, the proposed HOB and FSR are more than double the planning controls stipulated under the NSW Government's TOD planning reforms (maximum 22m HoB and maximum 2.5:1 FSR).
- Ryde Housing Strategy identified the potential for West Ryde to investigate for medium density housing. The Strategy did not include consideration for high-density development in West Ryde.

The applicant intended to justify the proposed HoB by comparing the approved/ proposed building height of other town centres in page 69-70 of the EIS and Rezoning Report and Appendix AA Stage 2 Visual Impact Assessment. Nevertheless, the determination of HoB should be considered based on local context and character. It is not suitable to justify the proposed HoB by directly comparing it with other town centres.

Additionally, the EIS and Rezoning Report Proposal outlined the justification for the proposal will enable the delivery of much needed housing supply that will contribute to achieving the 2024-2029 housing target of 11,600 for Ryde. However, Ryde is on track to achieve and exceed the housing target based on approval data. Approximately 6,500 additional dwellings have been approved between 2024 to 2025, which is just the first two years of the housing target timeframe. It is unclear why planning controls must be disregarded completely in such a significant manner.

Given that the strategic justification is insufficient, the proposed HoB and FSR controls are not supported. The proposed development is likely to result in an isolated tower development with inappropriate building bulk and is inconsistent with and unsympathetic to the predominant local character.

It is recommended that applicant consider reducing the HoB and FSR to align with the predominant existing and future local character of West Ryde.



### **3. Alignment with previous master planning work for West Ryde**

The applicant referred to previous master planning work done by Council. The proposed level of uplift that results in the highest HoB and FSR in West Ryde and Meadowbank area has not been supported by these previous master planning works.

Page 42 of EIS and Rezoning report outlined how the proposed amendments to RLEP align with Council's master planning works for West Ryde. It noted the site was identified as key opportunity sites in West Ryde Town Centre Revitalisation Strategy 2019 and West Ryde – Meadowbank Renewal Strategy 2023, including

- As a 'suitable catalyst sites' and 'last unconstrained development opportunity' on the east of West Ryde Station along Victoria Road
- Providing a coordinated 'lifestyle' (housing, amenity and high quality design) and 'opportunity' (local professional jobs, world-class education) development outcome

However, the identification as catalyst site in the Revitalisation Strategy 2019 is only to indicate the potential for redevelopment due to consideration of site area, site constraints and land ownership. It does not indicate the potential for intensified development. Notwithstanding, the height strategies proposed in the Revitalisation Strategy 2019 indicated medium-rise development of 3-4 storey for the site, in align with surrounding mixed use development. This shows that the proposed level of intensification does not align with Council's master planning work.

The draft West Ryde Town Centre Master Plan Draft Options 2021 also proposed only 3-5 storeys for the site.

The draft West Ryde – Meadowbank Renewal Strategy 2023 includes the site as part of Ryedale Road Precinct. The Renewal Strategy 2023 identified opportunities for high-density mixed use development at the commuter car park and heritage frontages along Ryedale Road. The subject site was not identified as an opportunity site. Thus, the justification for having the highest HoB and FSR in the area is unclear.

It is recommended that applicant consider reducing the HoB and FSR to align with the predominant existing and future local character of West Ryde.

### **4. Alignment with Meadowbank Education and Employment Precinct Master Plan**

The Meadowbank Education and Employment Precinct (MEEP) was published by the Greater Cities Commission in 2020. It identified public domain improvement opportunities anchored by the rebuild of TAFE and combined primary and secondary school.

One of the identified opportunities involves the development on the Ryde Pumping Station site owned by Sydney Water. It outlines the potential development that co-locates the state significant heritage item, open space and complementary uses (community/retail hub).

The shadow diagram in Section 8.2.2. in the EIS and Rezoning Report shows that the Ryde Pumping Station and/or its associated site curtilage is shadowed from 9am to 2pm during winter solstice. It is unclear if the overshadowing impact caused by



proposed development will compromise the potential development at the site.

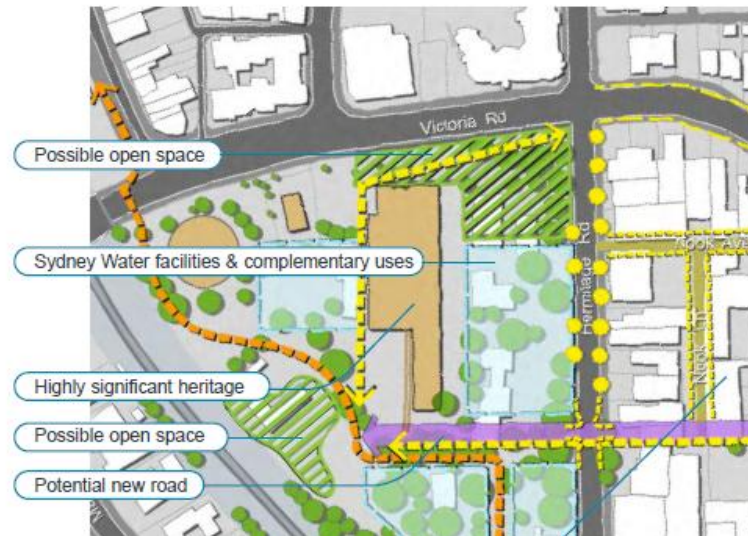


Figure 1: Indicative plan for Sydney Water site in MEEP

## 5. Waste Management Issues

The following documents were reviewed:

- Waste Management Plan, revision C, prepared by Elephants Foot, dated 20/10/2025
- Architectural Plans, prepared by Turner, dated 06/11/2025
- Traffic Impact Assessment, revision G, prepared by TTPA, dated November 2025

The proposed development has considerable waste access issues. The current proposal requires reversing across a vehicle thoroughfare, and it is unclear if this vehicle path will be retained. Additionally, it uses areas covered by easement.

The following issues are raised that require revised plans:

- a. Amend loading dock design to ensure the waste collection vehicle can enter and exit the site in a forward direction. Council doesn't support waste collection vehicles reversing across footpaths and high traffic areas.
  - i. As currently proposed, the waste collection vehicle must reverse into the building. This movement requires the waste collection vehicle to reverse through a vehicle thoroughfare and over easement impacted lands.
  - ii. Updated swept paths for a HRV to AS2890.02 are required to demonstrate forward entry and forward exit.
- b. Provide a minimum 2 metres rear clearance to support efficient servicing of bulk bins.

Additional clearance to the rear of the waste collection vehicle must be provided to ensure large bulk bins can be rotated and hitched to compactors.
- c. Amend the loading dock design and waste travel paths to support effective bin servicing and reduce the movement of bulk bins and heavy items.
  - i. As currently proposed, the site requires a platform hoist to transfer bulky household items from different elevations. Bulky waste and bins must be stored on the level in which they are collected from. Council waste

- collection contractors will not operate bin lifts and hoists to service waste rooms.
- ii. If waste is stored on a different level/elevation than which it is collected, an suitable method to transport the waste and an interim waste room on the collection level must be provided.
  - iii. Waste travel paths which contain steps must be replaced with ramps in accordance with relevant ramp grades (1:14 for 360 litre bins or smaller and 1:24 for bins greater than 360 litres).
- d. Provide a minimum 1.5 metre door to support efficient access to bins for servicing and rotation.
    - i. As currently proposed, FOGO rooms and bulky waste storage room doorways must be increased to 1.5 metres.
  - e. Amend the positioning of access to the retail garbage bin holding room to support safe and efficient servicing.
    - i. As currently proposed, the doorway does not support efficient access to bins as it conflicts between the stairway/ramp and the platform hoist
  - f. Provide a minimum 5 square metres for the storage of unwanted bulky items for the co-living component of the proposed development
    - i. Co-living waste arrangements must be separated from residential
  - g. Provide a minimum 5 square metres for the storage of unwanted bulky items for the commercial/retail component of the proposed development
  - h. Amend the size of the residential bulky waste storage room
    - i. The residential bulky waste storage room for 145 units may be reduced to a minimum 14m<sup>2</sup>
    - ii. Consider the reconfiguration to ensure large and bulky waste items are collected from the same level in which they are stored
  - i. Relocate the Residential FOGO bin holding room to ensure it can be safely and conveniently accessed by residents without the need to traverse through loading areas
    - i. As currently proposed, residents are required to access the FOGO bin holding room by access the loading area and using stairs/ramps. This proposed path is not suitable and increases unnecessary pedestrian movement in a heavy vehicle loading area.
    - ii. FOGO holding rooms must be relocated to be conveniently and safely accessed beside each lift core.
  - j. Update the waste management plan to detail how bins from the co-living component of the proposed development will be safely transported with support from bin movement aids
    - i. As currently proposed, the bin travel path is excessive for the rotate of bins and the travel path requires bins to be transported across vehicle ramps and through sign doorways. Due to the frequency of rotation and number of bins, the proposed path is not considered convenient or efficient.

## 6. Stormwater Management Issues

A review of the proposed stormwater management system highlights the following issues:

- a. The stormwater management configuration does not address the failure mode of the land (ie in the event of blockage or a storm event exceeding the system, surcharge flows will inundate neighbouring lots). Additionally, the proposal directs runoff to the inground drainage service to the north and this thereby contributes to flooding in Herbert Street. This is contrary to the objective in Council's Stormwater Management DCP which dictates that a drainage system must convey flow with the lay of the land to a valid point of discharge downstream. Noting that there is a public drainage service located in the neighbouring lot to the east, the development may need to formalise an easement through downstream land so as to direct runoff to this point, as per the DCP.
- b. Notwithstanding the above, the design of the OSD system has not considered the potential for a submerged outlet which may occur during extreme storm events. Accordingly, the system is unlikely to operate as designed for large storm events. This may be overcome by relocating the discharge to a point downstream, enabling the storage to be elevated above flood / overland flow and allowing it to freely drain.

## 7. Design Issues

- a. **Overshadowing issues:** Significant additional overshadowing on Sydney Water pumping station façade and possible future open space at the corner of Hermitage Road on Sydney Water land haven't been addressed in the submission package.
- b. **Setback:** The proposal provides a **0-metre setback** to the south-eastern boundary shared with the lot at **935 Victoria Road**. This assumes that the neighbouring site will be redeveloped to create continuous frontage. However, 935 Victoria Road has been identified as **high-risk flooding area**, with significant constraints that limit its potential for future redevelopment.

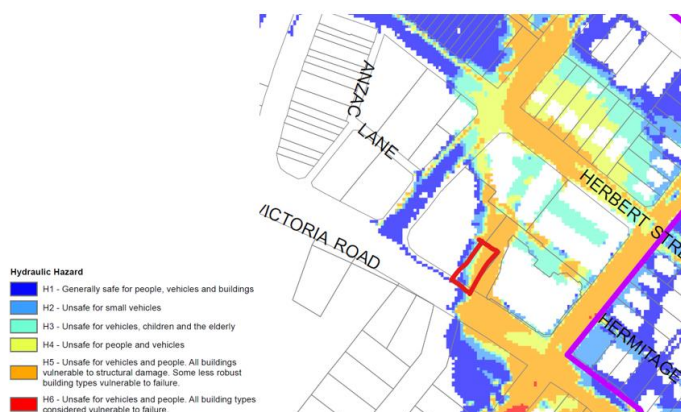


Figure 2: Hydraulic Hazard

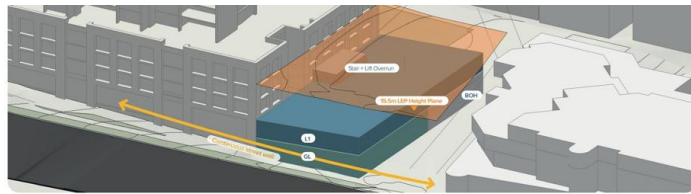


Figure 36 Indicative Massing of a Development at 935 Victoria Road

Source: Turner

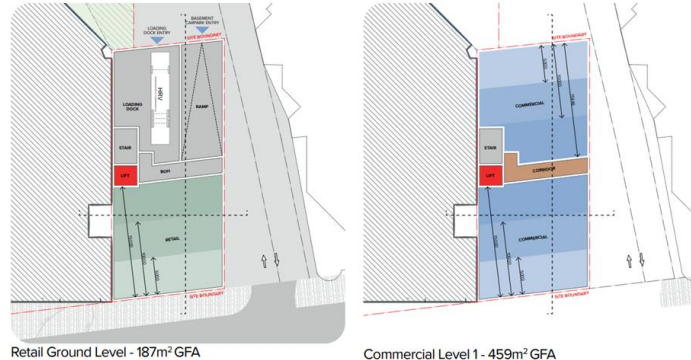


Figure 37 Ground Level and Level 1 Configuration of an Indicative Development at 935 Victoria Road

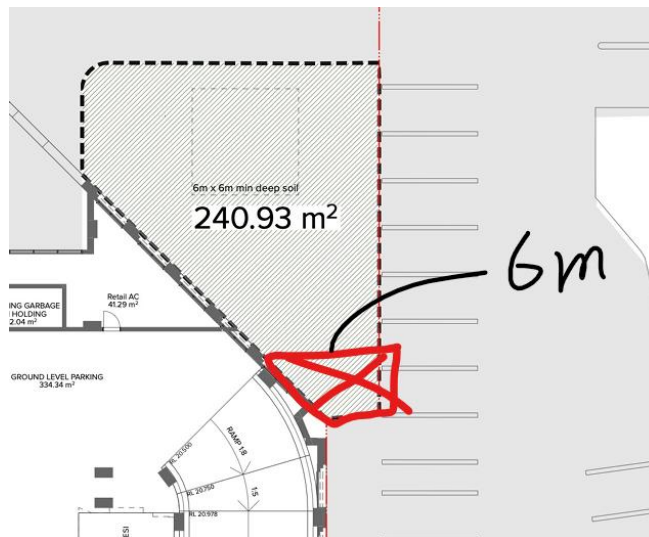
## Figure 2: GF and L1 Configuration

- c. **Podium parking:** The Application proposes parking and ramps within the podium levels, resulting in an enlarged podium floorplate and high site coverage, while significantly limiting the provision of deep soil zones and at-grade landscaping areas. This is not supported.



Figure 4: Plan showing podium

- d. **Deep soil zone:** The deep soil zone must have a minimum dimension of 6m, and therefore the corner area with a width of less than 6m, highlighted in the snip below, should be excluded from the calculation.

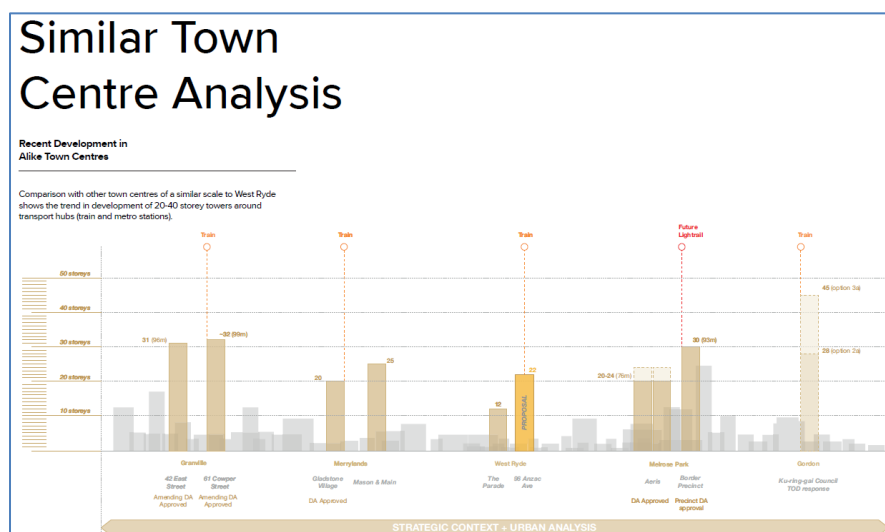


**Figure 5: Substandard deep soil area**

- e. **Building height benchmark:** The benchmarks selected to justify the proposed height (Granville, Melrose Park and Merrylands) are not comparable.

Granville and Merrylands are only one stop from the Parramatta CBD and are both serviced by multiple railway lines. Melrose Park is a large precinct-scale redevelopment transitioning from former industrial lands, with a compact urban form and higher built form across the precinct. Ku-ring-gai Council's alternative Gordon scheme concentrates density and height around the station and manages the transition from the station precinct to the surrounding low-rise residential areas, while excluding the application of LMR policies to lots within the defined TOD boundary. The proposed uplifts are tied to other controls, such as specific affordable housing requirements and non-residential FSR controls.

The defined LMR areas in West Ryde is currently subject to LMR controls. The subject site is adjacent to R2 zones to the north and east with maximum 9.5m building height control.



**Figure 6: Town Centre Analysis (EIS)**



**f. Suggested Design Changes:**

- i. Consider more comparable height benchmarks for the site contributing to the West Ryde local character and future vision. Require providing sufficient uplift justification.
- ii. Provide the request shadow analysis as followings:
  - The comparative impacts under existing vs proposed controls
  - Impacts if Housing SEPP bonuses were adopted over and above the proposed controls
- iii. Recommend providing a minimum of 3m side setback and separation to 935 Victoria Road.
- iv. Consider amenity impacts on residents from podium carpark and public carriageway. All parking should be located below ground and reduce car parking provision to reflect proximity to the train station and bus services along Victoria Road, while encouraging car-sharing and other sustainable transport solutions to mitigate traffic and movement impacts.
- v. Consider amenity impacts on residents from podium carpark and public carriageway. All parking should be located below ground and reduce car parking provision to reflect proximity to the train station and bus services along Victoria Road, while encouraging car-sharing and other sustainable transport solutions to mitigate traffic and movement impacts.
- vi. Revisit the deep soil zone calculation to ensure the required 7% of the site area is achieved.

**8. Traffic Issues**

The abovementioned development is shown to be serviced by three (3) levels of basement parking containing 195 car parking spaces, 6 motorcycle parking spaces and 57 bicycle parking spaces. One (1) internal loading bay is also proposed within the ground level which can accommodate HRVs. Vehicular access to the basement parking and loading facilities is proposed via a combined ingress/egress driveway connecting with Anzac Avenue at the north-western corner of the site.

**a. Loading Dock Considerations**

An internal loading area is proposed within the ground level. Access to the loading area is proposed via a combined ingress/egress driveway connecting with Anzac Avenue at the north-western corner of the site. The proposed access driveway will be used by both trucks and passenger vehicles to access the loading area as well as the basement carpark.

Applicants must ensure matters raised under Waste Management Issues are fully addressed.

**b. Pedestrian Upgrade Works**

The proposed development is expected to increase pedestrian and bicycle movements within the surrounding area. As a result, it is recommended that the following upgrades are provided to facilitate pedestrian and bicycle movements

around the site:

- Upgrade the existing at grade pedestrian crossing at the intersection of Anzac Avenue and Ryedale Road to a raised pedestrian crossing;
- Introduce bicycle lanterns at the intersection of Victoria Road and Hermitage Road to facilitate north-south cycling on Hermitage Road; and
- Upgrade all existing splitter islands of the roundabout at Herbert Street and Anzac Avenue to standard refuge islands.

The applicant is also required to undertake Road Safety Audits at the detailed design stage and the post construction stage of the upgrade works.  
All the above recommendations/requirements can be conditioned.

**c. Traffic Generation & Impacts**

Transport for NSW's *Guide to Transport Impact Assessment 2024* (GTIA) specify the following traffic generation rates applicable to the proposed residential development:

***High Density Residential Dwellings (high public transport accessibility)***

*AM Peak = 0.19 vehicle trips per dwelling*

*PM Peak = 0.15 vehicle trips per dwelling*

***Boarding Houses***

*AM Peak = 0.09 vehicle trips per boarding room*

*PM Peak = 0.13 vehicle trips per boarding room*

***Retail***

*AM Peak = 1.55 vehicle trips per 100m<sup>2</sup> Gross Leasable Floor Area*

*PM Peak = 3.3 vehicle trips per 100m<sup>2</sup> Gross Leasable Floor Area*

Based on the above trip generation rates, the proposed 149 residential apartments and 29 co-living rooms is expected to generate up to 31 AM and 26 PM peak hour vehicle trips to and from the site. The proposed retail shops would be expected to generate up to 9 AM and 20 PM peak hour vehicle trips to and from the site as suggested by GTIA.

Therefore, a total of 40 AM and 64 PM peak hour vehicle trips are expected to be generated by the proposed development.

Regarding the impacts of the additional traffic generated by the proposed development on the operation of the surrounding road network, the submitted TPA 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:

| Post Development Results        | Weekday AM |      | Weekday PM |      |
|---------------------------------|------------|------|------------|------|
|                                 | LOS        | AVD  | LOS        | AVD  |
| Anzac Avenue & Herbert Street   | A          | 9.4  | A          | 9.4  |
| Hermitage Road & Herbert Street | A          | 7.0  | A          | 6.6  |
| Victoria Road & Hermitage Road  | C          | 32.9 | C          | 29.2 |
| Victoria Road & Anzac Avenue    | A          | 2.9  | A          | 3.2  |
| Ryledale Road & Anzac Avenue    | A          | 5.7  | A          | 5.6  |

**Figure 7: SIDRA Modelling results**



Based on the results of the SIDRA modelling, the TPA concludes that the relatively minor generated peak traffic movements can be accommodated on the upgraded road system without any noticeable traffic implications, particularly as a result of the distribution over a number of access routes.

**d. Green Travel Plan (GTP)**

It is noted that a preliminary Green Travel Plan (GTP) has been prepared as part of TTPP's TPA report (Date: November 2025). 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.

**e. Construction Traffic Management Plan (CTMP)**

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 SSDA 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.

## **9. Vehicle Access and Parking**

- a.** The proposal seeks not to provide any parking allocation at all for the co-living arrangement. This is an unrealistic assumption that all the co-living occupants will not own a vehicle. It is warranted that some of the residential parking be allocated to the co-living units as the long-term occupants are more likely to elect to residing in the development due to its proximity to public transport and not own a vehicle.

Similarly, the development under allocates the retail parking allocation by 10 spaces, providing only 15 of the 25 spaces required. It is recommended that the applicant provide the full requirement of retail spaces.

The development is noted to provide a relatively high number of tandem spaces to be allocated for the resident component. These paired spaces must be allocated to a single unit. The Traffic and Parking Report has not considered this, however, has just viewed the pool of parking availability and claimed it as compliant. The report should be extended to examine the allocation of paired parking and ensure there is an equitable allocation of parking amongst the unit densities.

## **10. Public Domain**

Public Domain Plans, prepared in collaboration by a Civil Engineer and Landscape Architect. Plans to include:

- Council will require Public Domain uplift for both the Anzac Ave and Victoria Road frontages
- Removal of all redundant driveway laybacks along Victoria Road.
- Road pavement reconstruction:
  - Anzac Avenue: Half-road width, full-depth reconstruction.
  - Victoria Road: One-lane width, full-depth reconstruction.
- Upgrade of footpaths along both frontages to granite paving.
- Reconstruction of all kerb and gutter along both street frontages. Proposed kerb alignments and profiles must demonstrate appropriate integration with existing infrastructure.
- Upgrade of street lighting – luminaires and columns to be replaced with Multi-Function Poles compliant with AS/NZS 1158 and the Council Street Lighting Masterplan. Lighting must be powered by a metered supply.
- Preserve the existing street tree coverage along Anzac Ave and provide any additional street trees to the guidance of Council tree management officers

## 11. Open Space

- a. ANZAC Park is a relatively small local park that already services the surrounding catchment, and increased use may reduce amenity and accelerate wear without further investment. The proposal is likely to increase demand on ANZAC Park and the surrounding public domain. The scale of the development, including apartments and co-living accommodation, will increase the local population within walking distance of the park, and it is reasonable to expect greater reliance on the park for passive recreation and informal use. This will place additional pressure on turf, park assets, seating, pathways and maintenance services.

The public benefit currently proposed appears limited when considered against the scale of development and the likely increase in demand on nearby open space. Consideration should be given to seeking contributions toward upgrades or improvements to ANZAC Park to offset these impacts.

- b. Construction activities may also impact the park and surrounding streets through increased traffic, parking pressure, dust and noise. Appropriate construction management measures should be required to minimise impacts on nearby open spaces and street trees.

## 12. Environmental Health Issues

### a. Noise Intrusion

The acoustic assessment identifies road traffic along Victoria Road as the predominant external noise source influencing the site and contributing to noise intrusion across the development. Victoria Road is a classified road (indicated as a SP2 Classified Road in NSW Planning Portal Spatial Viewer). In accordance with the SEPP (Transport and Infrastructure) 2021, the development must take appropriate measures to ensure that the following LAeq levels are not exceeded:

- In any bedroom in the building – 35 dB LAeq (9hour) between 10:00 pm and 7:00 am

- Anywhere else in the building (other than a garage, kitchen, bathroom or hallway) – 40 dB LAeq at any time

As a result, the design is required to incorporate façade performance and provides required glazing and design requirements. An assessment of the internal noise with windows open has been undertaken and it is identified in order to comply with the requirements and determines that all windows will need to be closed to comply. As such, alternative mechanical ventilation must be used to meet the requirements of AS1668.

The report recommends possible solutions that need to be assessed at the detailed design phase which includes:

1. Upgrading the building façade and window glass to enable windows open, however no details of these requirements are provided.
2. Providing alternate sources of natural air which can include:
  - a. The use of a mechanical system such as a dedicated fan or the use of the fan within units FCU including an outside air source (which would not be required to condition air to provide outside air to the unit).
  - b. Provision of an outside air source to the intake air side of the Fan Coil Units (FCU) located in the ceiling space of each apartment.
  - c. Provision of outside air via a dedicated supply air fan which can be operated at the discretion of future occupants.
  - d. Other methods of outside air supply which are compliant with the requirements of the Australian Standard AS1668.2.

**b. Retail tenancies**

Retail tenancies have yet to be determined. Individual planning approvals will be required for these and should include noise assessments. However, considerations should be included for the provision of ducting for mechanical ventilation and other utilities

**c. Natural Ventilation Design Review Letter**

The Natural Ventilation Design Review Letter appears to require bedroom window to be open to enable/ meet natural cross ventilation potential. This is in direct conflict with the acoustic report in that all windows must be closed to meet noise requirements

### **13. Affordable Housing**

The proposed development is intended to deliver 145 dwellings, including 4 dwellings as affordable housing, which accounts for only 2.5% of the GFA. Given that a significant uplift is being sought, the provision of only 4 units as affordable and that too for only 15 years is tokenistic. Council objects to the lack of affordable housing, and seeks that the provision of affordable housing should align with Council's Draft Key Workers Affordable Housing Policy 2025 to deliver affordable housing in perpetuity.

Similar developments have proposed around 5-10% affordable housing and in perpetuity. It should be noted that the nearby development at 2-6 Chatham Road by City of Ryde Council Submission SSD-81610714

the same developer will deliver 4.8% of the GFA as affordable housing and be dedicated to Council in perpetuity, negotiated through a VPA with Council.

Council further notes that the proposal seeks consent for increased height and 145 residential apartments, which is 15 additional units compared to what was shown in the HDA proposal and SEAR request.

The proposed development should include more affordable housing (10%) and ensure it is in perpetuity.

#### **14. Commercial floor space**

The subject site is currently occupied by a 2-storey commercial building with 3,365sqm (from the pre-lodgement scoping proposal). The proposed development includes four retail tenancies at ground level of Victoria Road and Anzac Avenue with 609sqm, which is a substantial reduction in commercial floor space. This is a potential inconsistency with the *North District Plan* and *Ryde LSPS* that seek to retain and enhance the commercial floor space in centres to support their economic vitality and viability.

EIS and Rezoning Report suggests the proposed development includes an appropriate amount and type of non-residential floor space (page 45) and the proposed development will reverse the 'declining rate of employment on the site by delivering premium retail floor space' (page 48). However, no justifications have been provided to support these claims.

To ensure the protection of commercial floor space, a minimum commercial floor space control for the site should be included through amendments to Part 6 Additional local provisions of *Ryde Local Environmental Plan 2014*. This is to prevent the potential conversion of retail spaces through modification DA.

The following are recommended:

- The application should include an economic and employment analysis to demonstrate how the proposed development could support and enhance economic vitality and viability, in alignment with relevant strategic planning documents.
- Include a minimum commercial floor space clause for the site in *Ryde Local Environmental Plan 2014*.

#### **15. Heritage impact**

The subject site is in close proximity to Ryde Pumping Station, a State heritage item, separated by Victoria Road. Section 8.3 of EIS and Rezoning Report suggested that the proposed development is considered to be acceptable from a heritage perspective by retaining significant views and not impacting the landmark presentation of Ryde Pumping Station along Victoria Road.

However, page 73 of EIS and Rezoning Report indicates the assessment of visual impact for the proposed development at Victoria Road is moderate – high significance. Given this significance of visual impact, the justification for 'acceptable' heritage impact is unclear. Mitigation measures are also not outlined.

## 16. Overland Flow and Flooding Issues

The following documents were reviewed by Council's Drainage Team:

- Survey plan (Revision E) prepared by ATS Land & Engineering Surveyors Pty Ltd dated 29 October 2025. {Trim ref: D26/14927}
- Flood Impact and Risk Assessment (Issue A) prepared by SGC Pty Ltd dated 31 October 2025. {Trim ref: D26/14908}
- Architectural plans prepared by Turner dated 6 November 2025. {Trim ref: D26/14888}
- Stormwater management plan (Revision A) prepared by SGC Pty Ltd dated 29 October 2025. {Trim ref: D26/14920}

The following comments/ issues are raised:

- a. Flood Impact and Risk Assessment (Issue A) prepared by SGC Pty Ltd dated 31 October 2025 to be revised and reflect the below:

- i. Based on Council's previous comments for PRL2025/48, the proposed flood impact statement would only be considered acceptable where there is no encroachment into the PMF or 1% AEP flood extents and no change to existing natural ground levels.

The updated flood impact statement does not clearly demonstrate the 1% AEP and PMF flood extents in relation to the proposed development. This must be clearly shown on plans and appropriately addressed within the flood impact statement to confirm compliance with Council's requirements.

- ii. If the proposed development is of the same footprint, scale and extent as the existing building, this should be clearly stated in the flood study report and demonstrated on the architectural plans for verification.
- iii. Should the flood study report fail to demonstrate compliance with the above requirements, a comprehensive flood study and hydraulic modelling will be required to support the proposal.
- iv. The architectural plans indicate that the proposed development encroaches into a significant portion of the PMF flood extent within the site, as shown in the figure below. Accordingly, the proposal may result in increased off-site flood impacts during the PMF event. Please see Council PMF flood extent map and the architectural maps screen shot below for your reference:



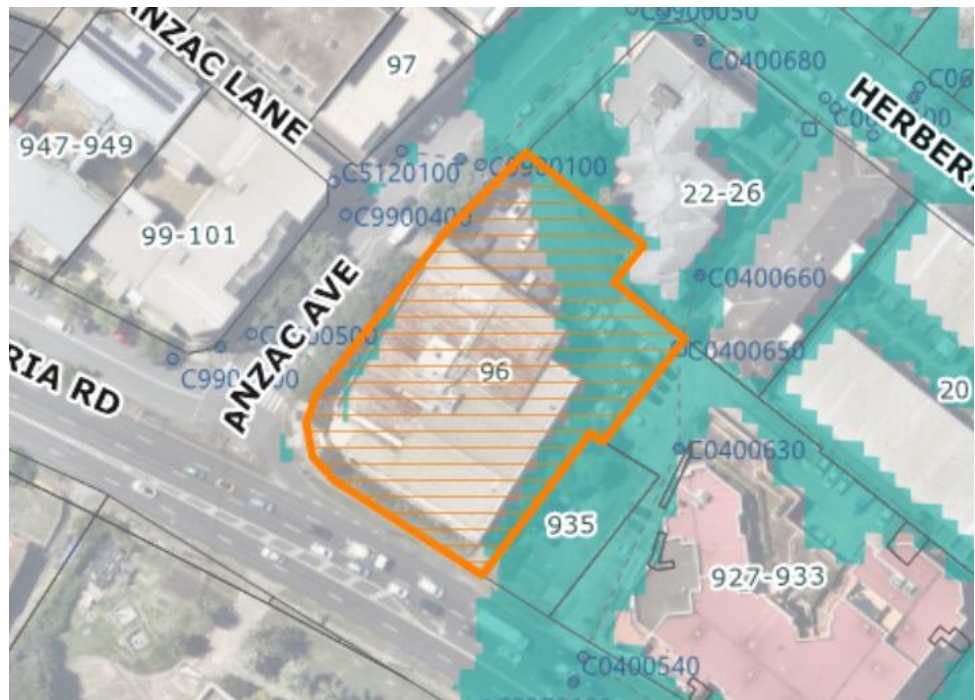


Figure 8: Existing PMF extent

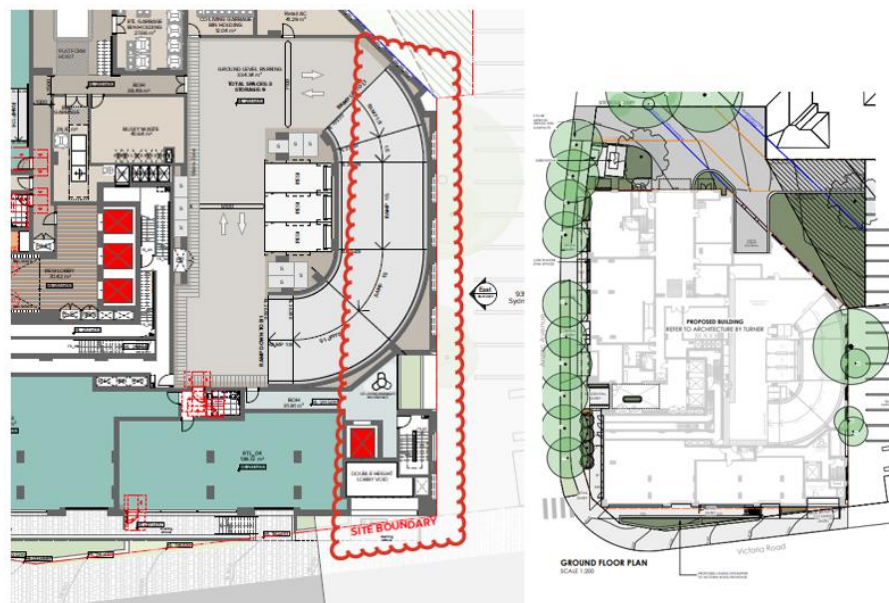


Figure 9: Proposed development within the PMF extent

- v. The Flood Impact Assessment recommends a driveway crest level of RL 17.34 m AHD based on the adopted PMF level to assist in preventing floodwater ingress to the basement. However, further review indicates that PMF levels upstream of the site are higher than those nominated in the report.

Additional flood protection measures to be investigated based on the upstream PMF flood conditions at the proposed basement access. These may include revising the driveway crest level and/or incorporating a flood barrier kerb to protect the basement entry, as illustrated in the figure below.



Please note that the provision of flood gates does not replace the requirement to achieve the minimum habitable and non-habitable floor level freeboard requirements.

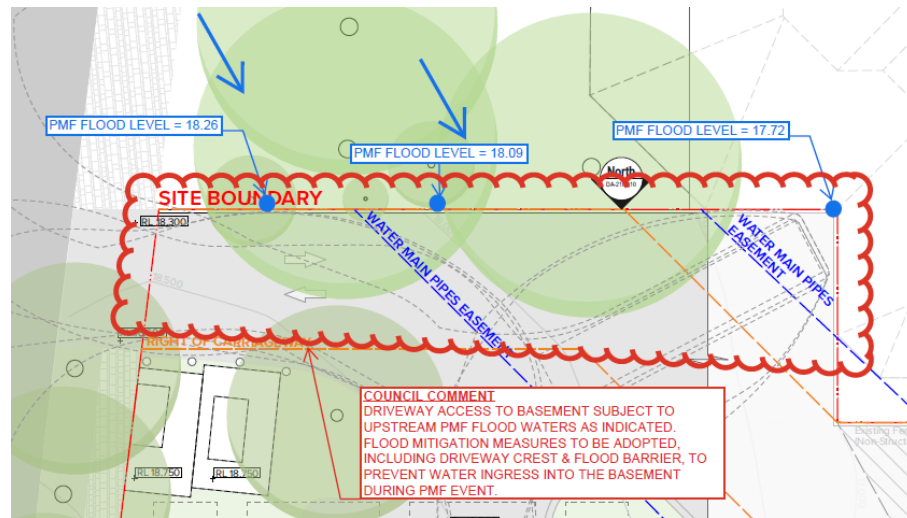


Figure 10: Driveway crest level & flood barrier kerb required

- vi. The architectural plans and the flood study report must clearly demonstrate how the basement area is protected against flood ingress, including reference to the adopted PMF level and the corresponding proposed finished surface and floor levels.
- vii. As the site is located within the Flood Planning Area, please demonstrate how the proposal complies with Council's DCP requirements in relation to minimum non-habitable floor levels. This must include confirmation that all relevant floor levels achieve the required freeboard above the 1% AEP flood level, including a minimum 300 mm freeboard for commercial zones within the site.

#### 2.1 Freeboard requirements

The following table specifies minimum freeboard requirements based on type of overland flow and category of the development to ensure that such development is not subject to stormwater inundation or nuisance flooding.

| Drainage System/ Overland Flow                                    | Residential               |                                                                                      |                                    | Industrial/ Commercial    |             |
|-------------------------------------------------------------------|---------------------------|--------------------------------------------------------------------------------------|------------------------------------|---------------------------|-------------|
|                                                                   | Land Level <sup>(a)</sup> | Habitable Floor Level                                                                | Non-Habitable Level <sup>(a)</sup> | Land Level <sup>(a)</sup> | Floor Level |
| Surface Drainage/ adjoining ground level <sup>(a)</sup>           | -                         | .15m                                                                                 | -                                  | -                         | .15m        |
| Public drainage infrastructure, creeks and open channels          | 0.5m                      | 0.5m                                                                                 | 0.1m                               | 0.3m                      | 0.3m        |
| Flooding and Overland Flow (Overland Flow Precincts and Low Risk) | N/A                       | 0.3m                                                                                 | 0.15m                              | N/A                       | 0.3m        |
| Flooding and Overland Flow (Medium Risk and greater)              | N/A                       | 0.5m                                                                                 | 0.3m                               | N/A                       | -           |
| Onsite Detention <sup>(a)</sup>                                   | N/A                       | 0.2m                                                                                 | 0.1m                               | N/A                       | 0.2m        |
| Road Drainage Minor Systems (Gutter and pipe flow)                |                           | 0.15m below top of grate                                                             |                                    |                           |             |
| Road Drainage                                                     |                           | Refer to Figure 2-1.                                                                 |                                    |                           |             |
| Detention Basins <sup>(a)</sup>                                   |                           | The top water level shall be designed to be 0.5m below top of embankment (100yr ARI) |                                    |                           |             |

Table 2.1 Freeboard requirements.

- viii. The architectural plans indicate that cut/fill is proposed within the site. Detailed cut and fill plans must be submitted, and the flood study report must clearly identify and quantify any proposed filling within the mapped flood extent, including an assessment of associated flood impacts.
- ix. Please confirm whether the most recent Council 2025 Flood Study (publicly available version) has been adopted for this assessment.

Please also note that the use of previously purchased Council TUFLOW models prepared for other projects is not permitted for separate developments, in accordance with Council's data sharing agreement. **This is provided as a general advisory note only.**

### 3.11 Conclusion

A detailed investigation on the flooding behaviour has been undertaken in the vicinity of the proposal at 96 Anzac Parade, West Ryde.

Using the established model for Parramatta River – Ryde Sub Catchment Flood Study, the study determined the flood behaviour for the 5% & 1% AEP design floods. The PMF flood event is also simulated.

The impact of the proposed development was assessed and was found to be NIL. In our opinion, the development in its current proposal should be approved.

- b. Stormwater management plan (Revision A) prepared by SGC Pty Ltd dated 29 October 2025 to reflect below:
  - i. Council notes that the existing pit was constructed in 1969. The proposed upgrade includes a pit with a 2.4 m lintel and 900 × 450 mm galvanised steel grated inlets.
  - ii. Details of proposed connection to Council pit, including the size and material of the pipe and slope of the connection to be noted on the plan.

## Conclusion

City of Ryde Council, thanks the Department for providing Council the opportunity to comment on the proposed SSD Application.

In the Application's current form, a significant number of issues remain unresolved, and Council requests these issues be addressed by the Applicant before the application proceeds further.

City of Ryde appreciates the need for housing in the region, however the design has not taken into consideration the numerous critical issues that have been raised in this submission.

It is recommended that the application be amended to address these issues and additional information be made available for Council to review the matter again before the application proceeds any further.

- End of Advice -