

ATTACHMENT 1

City of Ryde Submission

15-21 Cottonwood Crescent, Macquarie Park
SSD-940006708

Amendment to RLEP2014

- Proposed building height: 205.5m 212m (currently 65m)
- Proposed FSR: 14.5:1 16.8:1 (currently 4.5:1)

SSDA

- Construction of a residential development 858 dwellings
- Height: 60 storeys / 212m (currently 65m under RLEP2014),
- Proposed FSR: 16.8:1 (currently 4.5:1)
- Total GFA = 86,224m²

Council File reference: COR2025/484/6
Submission Date: 21 April 2026

EXECUTIVE SUMMARY

Introduction

Thank you for inviting City of Ryde Council to comment on the proposed SSD at the above site.

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

Specifically, the application involves:

Amendment to RLEP2014

- Proposed building height: 212m (currently 65m)
- Proposed FSR: 16.8:1 (currently 4.5:1)

SSDA

- Demolition of existing buildings and site preparation works
- Construction of a residential development comprising two residential flat building towers above a common 6 level basement car park / sleaved podium incorporating residential, car parking, and a retail component within the Waterloo Road frontage incorporating up to 858 dwellings, of which 10% of the uplift of the dwellings will be for future affordable housing units (7% of total dwellings)
- Height: 60 storeys / 212m (currently 65m under RLEP2014),
- Proposed FSR: 16.8:1 (currently 4.5:1)
- Total GFA = 86,224m²
- Landscaping: 2,794 m² of landscaping across the site (53% of the site), which comprises 5% additional landscaping than approved under LDA2024/0158. Deep soil area – 421m² (8.2%)

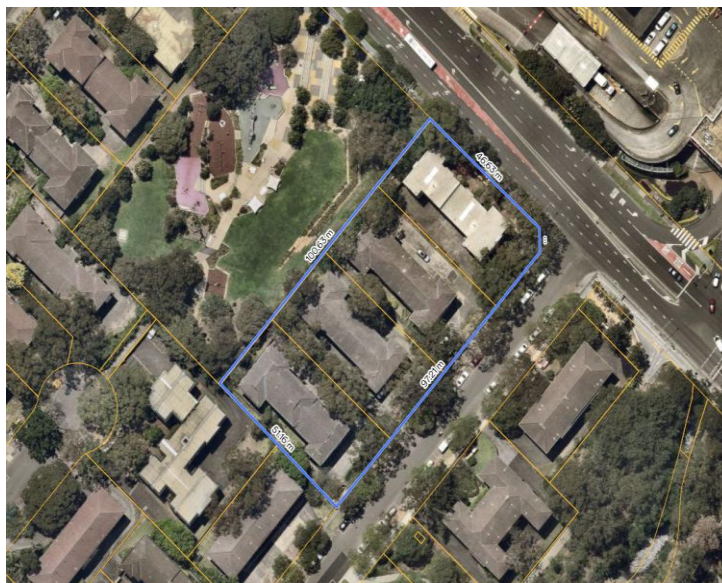


Figure 1: Site aerial view

The relevant issues with respect to SSD-94006708 have been detailed below:

1. Strategic Inconsistency

The application states that the project aligns with the Local Planning Strategies, however, inadequate planning and urban design justification has been demonstrated, rather the application relies heavily on Ministers declaration of the SSD pathway and provision of housing supply as part of the proposal. However, this does not justify the excessive height and FSR on this site.

The subject site is not identified as benefiting from any increase in height of FSR in any of Council's or DPHI's adopted strategic policies. In addition, the subject site is not identified as being within Macquarie Park Corridor, for the purposes under the Ryde LEP2014 (part 7) or any of the Departments rezoning of Macquarie Park. The site is located outside the Macquarie Park Stage 1 and Stage 2 rezoning boundaries. The site is located within the Herring Road Activation Precinct, which around 2010-2016 went through a state rezoning process and received uplift to the current controls under the RLEP 2014, which are already generous and are based on the level of infrastructure that can cope with the density on the site. The proponent is seeking to further increase the height and FSR, this highlights that the applicant's proposal is an out of sequence rezoning that is not responding to existing infrastructure and the strategic planning frameworks.

The proposal seeks a maximum building height of 205.5m (now 212m), which substantially exceeds both:

- the tallest building currently approved in Macquarie Park (Trilogy by Meriton), and
- the future height framework envisaged for identified key sites within the Macquarie Park TOD Precinct.

A detailed strategic and site-specific assessment is required with the planning proposal, including assessment against the 9.1 Ministers Directions. Details provided in the EIS are not adequate and the proposed height and FSR as proposed cannot be justified. Council seeks that the building height and FSR be reduced and or additional community benefit be provided to address the increased infrastructure demand imposed by this development.

2. Lack of Infrastructure & Infrastructure Impact/ Demands not addressed

Unacceptable increase in density (yield, FSR and height)

The development is seeking approval of a two-tower residential development comprising 858 dwellings, of which 10% of the uplift (60 units) of this will be for affordable housing units for 15 years. This translates to 7% of the overall dwelling yield. The application is being made via the Housing Delivery Authority (HDA) pathway as State Significant Development (SSD) with a concurrent rezoning for the following:

- Increase the height of building (HOB) control from 65m to 211.5m, and
- Increase the floor space ratio (FSR) control from 4.5:1 to 16.8:1.

There is an existing DA approval, determined by Council in April 2025, under LDA2024/0158 which approved a residential development comprising 255 dwellings. The SSD is seeking an approximate 374% increase in Gross Floor Area (GFA) from the approved 23,071m² to 86,224m² with no provision of additional infrastructure above the required s7.12 levy.

The site is located outside of the Macquarie Park Transport Oriented Development (TOD) precinct and affordable housing scheme area. However, the Macquarie Park Corridor Section 7.12 Contributions Plan 2025 (s7.12 Plan) applies.

S7.12 contributions

The s7.12 Plan was prepared by the Department of Planning, Housing and Infrastructure to support the rezoning of Macquarie Park. The Minister for Planning and Public Spaces amended the *EP&A Regulation 2021* to facilitate a 4% levy on residential development which will apply to this application. The EIS identifies an estimated development cost to be \$674,400,000 (excl. GST), however, a detailed quantity surveyor report must be provided to verify this.

The proponent has requested contributions to be paid in ten installments based on the construction staging plan provided in Appendix PP to the EIS. Section 3.1 of the 7.12 Plan requires payment prior to the issue of the first CC, however the staging of contributions can be facilitated for staged development. Sufficient information must be provided to determine each staged payment. Therefore, the proponent must provide a detailed QS report identifying the breakdown and cost of works for each proposed stage.

Furthermore, the s7.12 Plan does not anticipate or address the level of infrastructure demand that that will be generated by the proposed development. The local infrastructure demand generated by the additional 603 dwellings on this site cannot be addressed through the payment of a s7.12 levy alone. Further commentary on this matter is below.

Key sites in Macquarie Park

The NSW Government's recent rezoning of the Macquarie Park Transport Oriented Development (TOD) Precinct facilitated increased development capacity in 13 key sites. The increase in permissible GFA on these sites ranged from 120% to 253%. This additional yield can only be accessed if specific additional open space, access infrastructure, and affordable housing is provided on the respective sites. The additional open space requirements on key sites is an average of 20% of the uplift. This infrastructure is identified in Part 7 of RLEP and is in addition to the 7.12 levy for local infrastructure.

The NSW Government's rezoning was informed by economic analysis to balance feasibility with an appropriate level of infrastructure provision. This application seeks significant uplift that is far greater than the key sites, i.e. 373% increase in GFA uplift. Therefore, the application should include similar infrastructure considerations as the key sites.

Previous letter of offer

In 2024, Council and the applicant held initial discussions on a draft VPA for the development of the site. The draft VPA offer was supported by a feasibility assessment that demonstrated an additional public benefit valued at approximately \$86.25 million to address anticipated infrastructure demands was reasonable. A similar level of infrastructure provision should also be considered as part of the SSD application to address infrastructure demands in addition to the required s7.12 levy.

The SSD argues that the s7.12 contribution levied under the SSD will be greater than what has been conditioned under LDA2024/0158 and that together with the provision of 7% (60 units) for affordable housing units for 15 years, it is sufficient to address infrastructure demands and therefore does not require a planning agreement. However, this is **not supported**.

The additional demands generated above what has been anticipated under the s7.12 plan must be addressed through provision of additional infrastructure above what has been planned under the s7.12 contributions plan and is encouraged to be delivered via a planning agreement.

The following additional information is required:

- A QS report identifying the breakdown and cost of works for the entire development and each proposed construction stage.

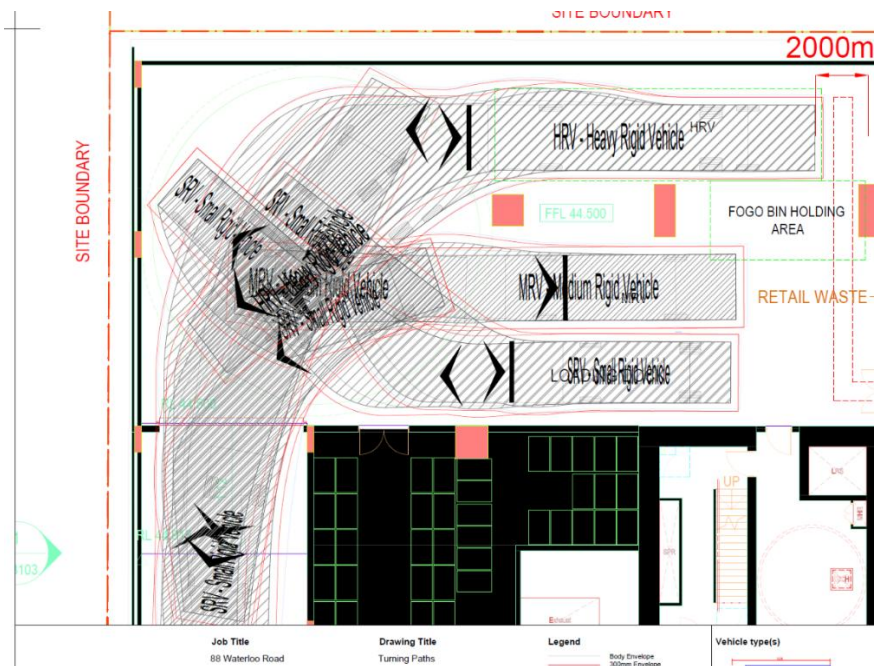
3. Waste Management Issues

During consultation with Council the applicant was requested to provide additional information and was provided with advice regarding the required Waste Management arrangement on the site. However, this matter has not been addressed in the SSDA. Council strongly objects to the proposal on these grounds.

The following issues must be addressed:

The applicant is required to redesign the waste storage and collection area and provide details to demonstrate full compliance with Council requirements. The following has not been addressed and is required:

- a. Provide swept paths for a heavy rigid vehicle in accordance with AS 2890.02 to ensure waste collection vehicles can safely access the site for servicing.
 - The swept paths provided cannot be used to clearly identify the proposed transit of the 12.5 metre HRV utilised for waste collection. Swept paths must be clearly identified for each vehicle type.
 - The paths detailed in the Traffic Impact Assessment do not clearly show the vehicle body therefore conflicts cannot be determined.
 - The provided swept paths do not clearly demonstrate whether the proposed turntable is unobstructed from bins doors, or support structures. This space must remain clear of all obstructions to support safe and efficient servicing.



- b. Provide a minimum 1.5 metre door to support efficient access to bins for servicing and rotation.
 - o FOGO waste rooms shown demonstrate a single doorway.
 - o The provision of 1.5m doorways support more convenient access with bin movement equipment and future proof waste room design for larger bins or equipment.
- c. Provide a bin movement aid (e.g. tug and trailer) and suitable storage beside the waste collection area. The proposed bin movement paths are excessive for the manual movement of bins for servicing.
- d. Provide a minimum 5 square metres for the storage of bulky items from the commercial tenants, including furniture and pallets to reduce potential illegal dumping.
- e. Provide an updated waste management plan which reflects the required changes.

4. Stormwater Management Issues

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

- a. The applicant has sought exemption from the provision of onsite detention by analysis of various discharge configurations and the modelled peak overland flow from the 1%AEP flood event. The analysis however draws some concern however given that there appears to be very minor difference between the peak discharge arising from the scenario having no OSD system at all (unrestricted discharge) and that with OSD (discharge is attenuated by OSD). This is illogical outcome. Details of the OSD model have not been provided however it is possible that the designed system (and DRAINS model) may not have been designed to account for a “submerged outlet” due to the flood affectation in Cottonwood Crescent. In which case, the modelled system would simply result in failure of the OSD (surcharge) and unrestricted runoff back to the trunk drainage. If this is the case, the analysis will need to be revisited and further, the DRAINS model will need to be submitted for review.

- b. The WSUD treatment tank is located at the lower end of the site and the base of this tank is marginally above the invert level of the kerb inlet pit into which it discharges to. Accordingly it is very likely that, in the event of a significant storm event, backflow will occur into the private drainage system. To resolve this requires elevating the WSUD tank so as to achieve a free draining system, warranting the base of the tank to be above the level of flood water in Cottonwood Crescent.
- c. Similarly any rising main will need to discharge to a surface inlet pit above flood levels, however this could readily be addressed by condition.

5. Vehicle Access, Servicing Facilities and Parking

The development proposes to provide the maximum level of offstreet parking based on the parking rates in the DCP Part 9.3 (Parking Controls). Considering the site is opposite a major public transport hub, having access to many multiple bus services and Metro train service, this is an unacceptable arrangement and disregards the principals of a Transport Oriented Development. The objectives of the parking controls in the Macquarie Park corridor seek to reduce the reliance of private motor vehicles as a means of public transport.

The proposal also exacerbates the matter by providing only 38% of the maximum residential visitor parking allocation. Given that restriction of resident visitor spaces has no effect in terms of vehicle ownership, it is also far less to influence the mode of transport for transient visitors to the site. Noting this and the very high demand for onstreet parking in the surrounding area, it is strongly advised that the allocation of visitor parking be maximized (86 spaces).

With respect to vehicle access, the following matters are noted and require attention;

- The service area accommodates only a single lane of service vehicle traffic. It is warranted that the entry to the facility be widened or a waiting bay be provided inside the property at the entry (so as to allow two way, opposing vehicle flow). The possibility of service vehicles having to stand and block through traffic in Cottonwood Crescent whilst waiting for an opposing vehicle to exit cannot be supported.
- The architectural plans should include a section taken through both internal ramps so as to confirm that the required grades and height clearances are achieved. It is understood that the driveway may require crest thresholds to be provided to prevent inundation by flood waters and therefore this may complicate a typical stacked ramp design.
- The visitor parking section on Lower Ground is noted to terminate in a dead end aisle that is longer than 6 parking bays. As per AS2890.1, the arrangement will warrant a turning bay to be provided at the end of the aisle.

The proposal is noted to accommodate tandem parking and this will warrant that such spaces be allocated to the same unit. This matter could be addressed by condition.

6. Drainage Issues

a. Flood impact statement to be prepared and reflect the following:

- The applicant shall prove that the proposed development is not adversely affecting the flood conditions of neighbouring properties or downstream catchment.
- The proposed development shall not obstruct or redirect overland flow paths, including impacts from buildings, driveways, landscaping, etc.
- Any proposed cut and fill is to be clearly identified and demonstrated to not adversely affect flood behaviour.
- Basement Ramp to raise to PMF level before descending to the basement to ensure basement flood immunity.
- Please provide the certificate from the flood engineer that the proposed basement openings are not inundated during PMF flood event.
- A cross section of the basement ramp to be provided and clearly demonstrate that the crest of the basement ramp is designed up to PMF level.

b. Stormwater Management Plan to Be Provided and reflect the following:

Details of the connection to Council pit/pipe shall be included in the Stormwater Management Plan.

7. Design Issues

a. There is no strategic basis or policy alignment to justify the proposed height or density on this site.

Relative to the built form outcomes and public contributions expected from the identified key sites in the Macquarie Park rezoning, the proposed scale and intensity of development on this comparatively small site is not appropriate. Council also holds significant concerns regarding the absence of the necessary transport, social, recreational, educational, and other infrastructure required to support the level of density proposed.

b. Tower Form configuration

The proposed scheme includes two towers with a minor height variation and an 18 m building separation. Council notes a considerable increase in overall building bulk compared to the previous DA scheme, particularly building depth.

- The **Cottonwood tower** has an approximate depth of **26 m**.
- The **Waterloo tower** has an approximate depth of **28 m**.

These larger floorplates appear to have been maximised to achieve a high GFA. Council is concerned about the resulting impacts on design quality and residential amenity, including:

- reduced solar access for apartments and communal open space,
- limited opportunities for natural ventilation at podium levels.

Council also has concerns regarding potential **wind, visual, and overshadowing impacts** on the public domain, communal open spaces, neighbouring residential areas, and the broader precinct due to the excessive building height and built form.

A comparison between the previous DA scheme (HOB:65m, FSR:4.5:1) and the SSD proposal (HOB:205.5m, FSR:14.5:1)(**new FSR 16.8:1**)



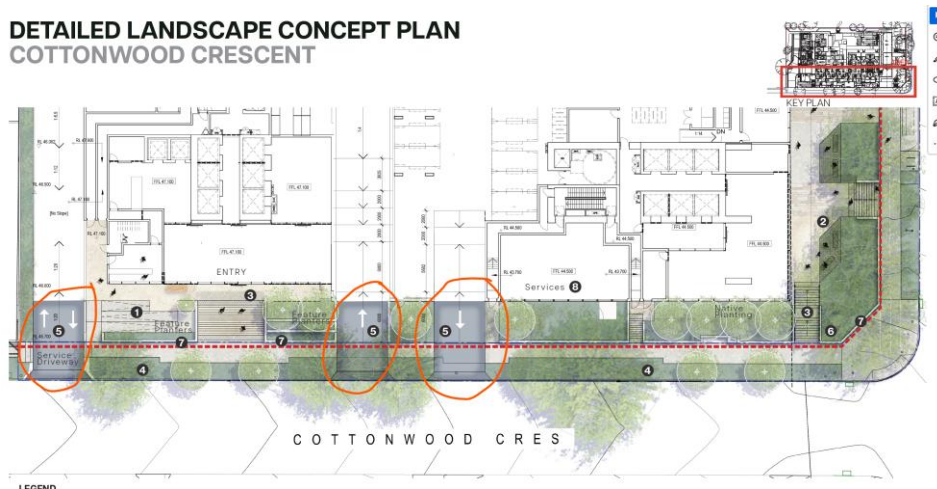
c. Car parking and podium parking

The proposal includes 695(now increased as well) parking spaces, distributed across six basement levels and five podium levels.

While the proponent states that parking will comply with the Ryde DCP, Council strongly encourages reduced parking provision given the site's proximity to the metro station. Excessive parking generates additional private vehicle use and local traffic impacts—particularly problematic in a proposal seeking such a substantial uplift.

The presence of two vehicle access points and one loading dock along Cottonwood Crescent poses additional risks to pedestrian movement and safety.

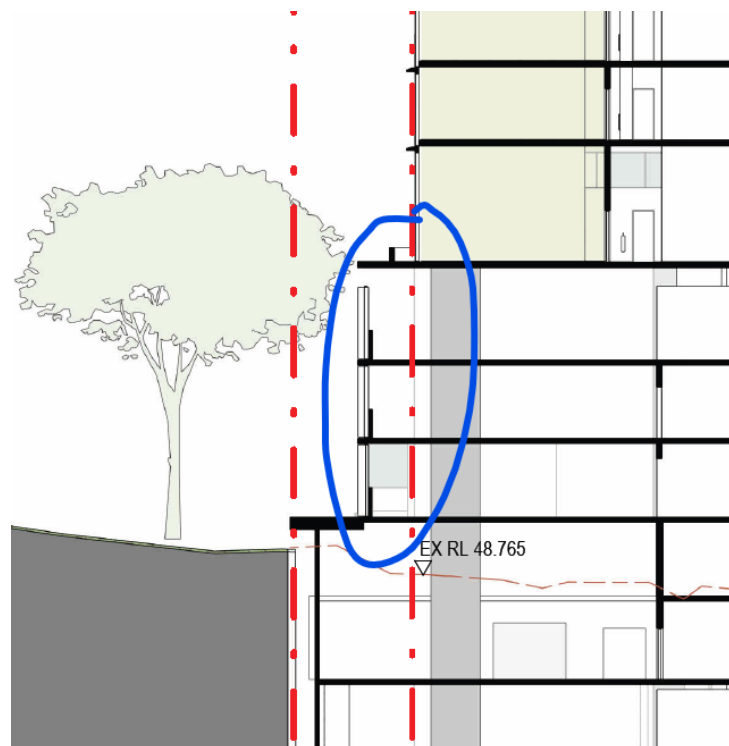
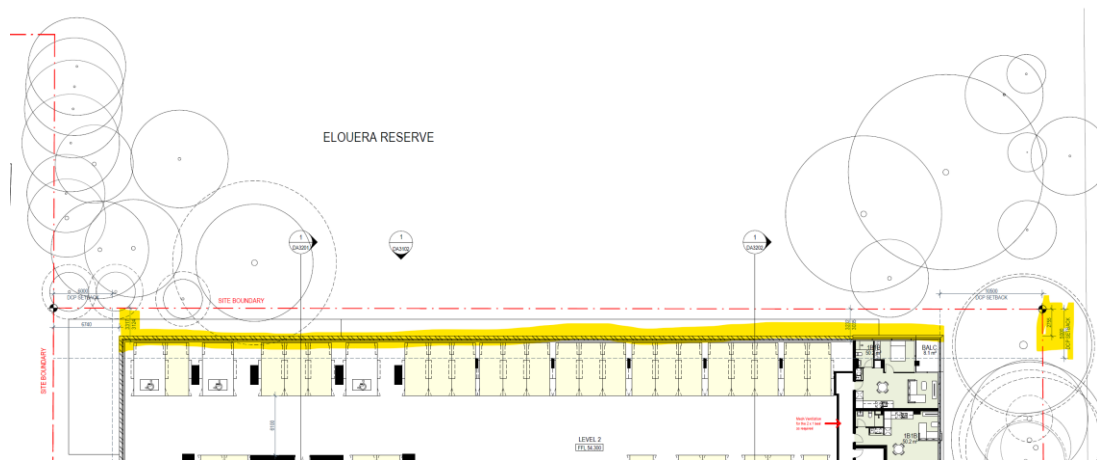
DETAILED LANDSCAPE CONCEPT PLAN COTTONWOOD CRESCENT



d. Setbacks and public domain interface

Varied setbacks are proposed along the western boundary adjoining Elouera Reserve. The podium levels (Level 1-3) provide setbacks of less than 3 m, which does not comply with the minimum 5 m setback required under the Ryde DCP. It also presents a solid wall as an interface with Elouera Reserve, raising safety concerns that require a CEPTED approach.

It requires design considerations to minimise visual and environmental impacts from podium car parking, and provide better interfaces with Elouera Reserve. It is recommended that all carparking is located below ground to improve the interface with Elouera reserve.

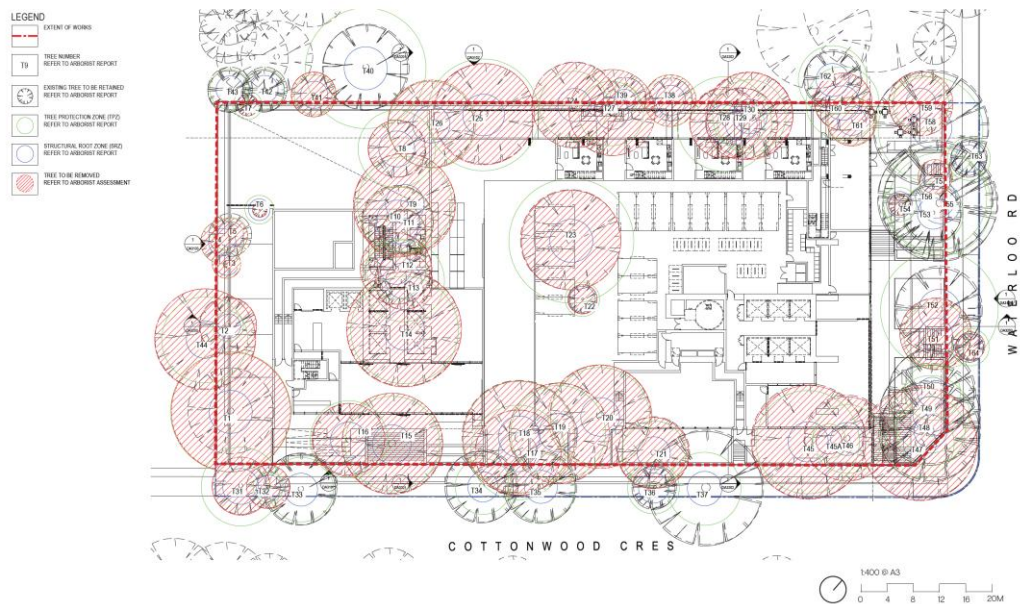


e. Tree Retention

Existing mature trees along site boundaries currently provide shade and environmental value. The provided tree removal and retention plan indicates that most trees will be removed. All mature trees should be retained to the street edge at both Cottonwood Crescent and Waterloo Rd. Council requires a detailed arborist report for the removal of any existing mature trees.



TREE REMOVAL / RETENTION PLAN



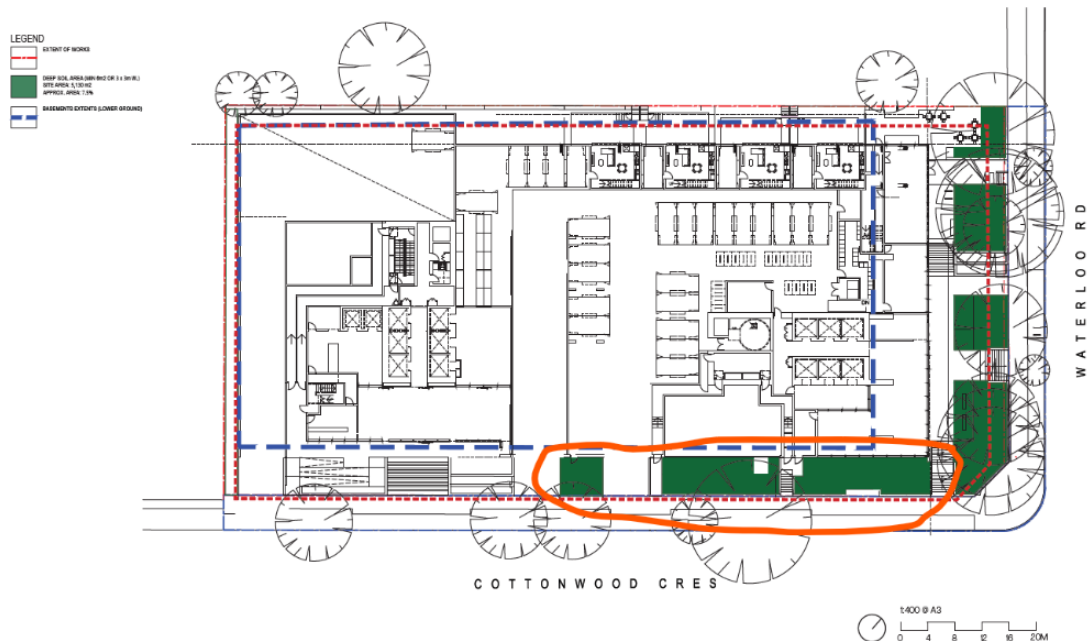
f. Deep soil zone

The ADG requires deep soil areas with a minimum dimension of **6m at either side, and a total deep soil provision of at least 7% of the site area.**

Deep soil zones along Cottonwood Crescent fall within the 5m building setback area and therefore:

- do not meet the minimum dimension, and
- fail to achieve the minimum 7% requirement.

DEEP SOIL STRATEGY

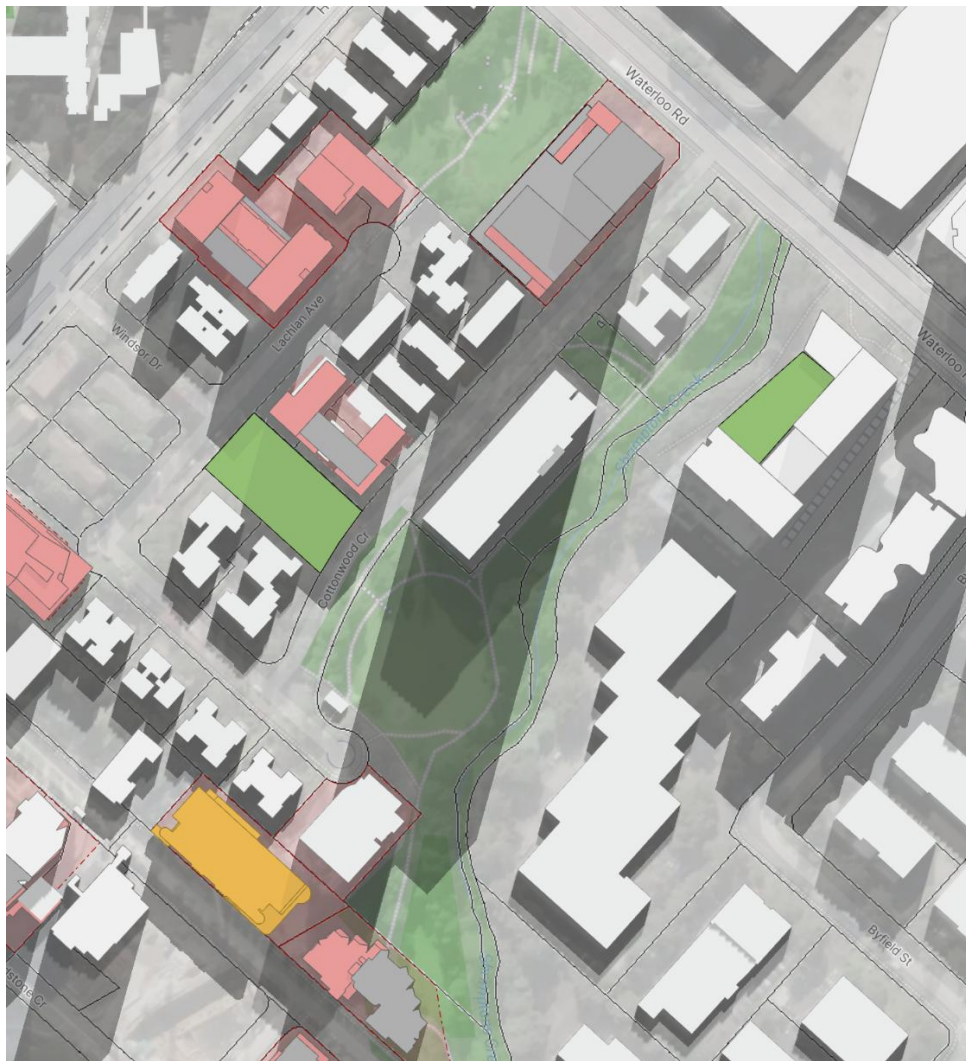


g. Overshadowing

Impact on nearby open space. No additional shadow analysis diagrams provided for review. Previous documents demonstrated that a 65m building height produced no additional overshadowing to Wilga Park, while the proposed 205.5m height casts additional overshadowing to Wilga Park from 9:35am – 12:15pm on 21 June.



11:00am (65m DA scheme)



11:00am (205.5m SSD scheme)

The proponent argues this reserve is currently significantly overshadowed. This should not be justification for making the situation much worse where the development will result in Cottonwood Reserve being almost completely overshadowed through the winter period.

It is noted that the proposal will significantly overshadow the Shrimpton's Creek area which results in it barely achieving the solar access requirements for public open space. There is also a significant impact on the solar access to Wilga Park up until 12 noon through the winter period. This will significantly impact on the amenity of these spaces for the broader community.

The potential reduction in sunlight for Shrimpton's Creek riparian corridor could negatively affect ecological functions. The mitigation measures proposed are vague. Long-term shadowing impacts on canopy growth, seedling establishment and ecological functions should be further investigated accompanied by detailed mitigation strategies.

Overshadowing impact on other residential development.

The proposed **205.5m height(now 212)** results in significant overshadowing of a broad south-eastern area, particularly impacts on:

- the solar access of the balconies and living rooms on the north-western facades of nearby residential buildings, and
- the rooftop communal open space at 82 Waterloo Road, highlighted in the snip below.



h. Design Recommendations

- Revisit the proposed uplift to better align with Macquarie Park's context and strategic role. Consider including non-residential GFA controls to support employment growth and deliver public benefits.
- Reduce building height, bulk and depth and increase tower separation to improve solar access, natural ventilation and residential amenity as well as mitigating visual, wind, noise and other environmental impacts.
- Ensure compliance with building setbacks controls and provide well-designed interfaces with streets and Elouera Reserve.
- Locate all parking below ground and reduce car parking provision to reflect proximity to the metro station and minimise traffic impacts.
- Increase building separation to min. 24 metres (currently 18 metres) to comply with the Apartment Design Guide.
- Revise the layouts to increase the number of ADG compliant cross-ventilated apartments, particularly to the podium levels.
- Ensure that solar access plan incorporates overshadowing impact from one tower onto the other within the site.
- Revise the west-facing two storey 2B 'Townhouse' typologies to the

- podium, to provide better access to natural light and cross ventilation. Currently these are single west-facing with no light to internal circulation spaces.
- ix. Retain all existing mature trees to street interface (within 6m deep soil zone of the site boundary) enhance site landscaping.
 - x. Provide compliant deep soil zones (minimum 6 m dimension, 7% of site area) in accordance with the ADG.
 - xi. Provide 10% of total dwellings as affordable housing, secured in perpetuity rather than based on the uplift.

8. Traffic Issues

It is noted that a preliminary Green Travel Plan (GTP) has been prepared as part of the TIA report. The mode share targets and measures outlined within this GTP would need to be altered/updated after finishing the construction works and prior to the issue of the occupation certificate to consider potential changes to the mode shares when the development is operational.

In addition, a preliminary Construction Traffic Management Plan (CTMP) has also been prepared as part of the TPA report. The CTMP describes how traffic activity is proposed to be managed to minimise disruption and safety risks to other road users on the public road when the construction works proposed as part of this DA are being undertaken. The measures outlined within this CTMP would need to be altered/updated at a later stage to provide details on the number of construction workers and the number of truck movement into/out the site, the proposal of temporary access driveway, and to take account potential changes to the traffic conditions within the surrounding road network and/or potential changes to the construction methodology closer to the commencement of construction (i.e. ensure relevancy). This can be addressed through consent conditions at the Construction Certificate stage.

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

Retail

AM Peak = 1.55 vehicle trips per 100m² Gross Leasable Floor Area

PM Peak = 3.3 vehicle trips per 100m² Gross Leasable Floor Area

Based on the above trip generation rates, the proposed 858 residential apartments is expected to generate up to 163 AM and 129 PM peak hour vehicle trips to and from the site. The proposed retail shops would be expected to generate up to 2 AM and 4 PM peak hour vehicle trips to and from the site as suggested by GTIA.

Therefore, a total of 131 AM and 133 PM peak hour vehicle trips are expected to be generated by the proposed development.

Regarding the impacts of the additional traffic generated by the proposed development

on the operation of the surrounding road network, the submitted TIA with the SSDA indicates that the additional traffic volumes have been assessed with SIDRA modelling for the post-development scenario. The following table provides a summary of the SIDRA modelling results of the intersections in the vicinity of the development site:

Intersection	AM Peak		PM Peak	
	LoS	Delay(s)	LoS	Delay(s)
Waterloo Road/Cottonwood Crescent	A	7	A	9
Windsor Drive/Herring Road	A	8	C	35

Based on the results of the SIDRA modelling, the TIA concludes that all intersections would retain their level of service under a 'future base' scenario which takes into consideration background traffic growth from other developments in Macquarie Park.

Loading Dock Considerations

An internal loading dock is proposed within the lower ground level. This internal loading area provides three (3) loading bays (one for HRV, one for MRV and one for SRV) and a turn table to accommodate the needs of the site based on the yields achievable under the development proposal.

Access to the loading dock is proposed via a one-way ingress/egress driveway connecting with Cottonwood Crescent at the south-western corner of the site. All vehicles will enter and exit the site from Cottonwood Crescent in a forward direction with the aid of a turntable.

The TIA report indicates that The building management team will be required to engage and maintain a Loading Dock Manager to organise and supervise delivery and removal activities while a delivery schedule will be organised by management to stagger and control arrival of deliveries.

To ensure that servicing arrangements including waste collection will be wholly accommodated within the site without interfering with the safety of all road users and the efficiency of traffic movements on the public road, a condition for Loading Dock Management Plan will be imposed as part of consent for this SSDA.

The above are noted and Council will recommend conditions to be imposed should the development be approved on this site.

9. Social Impact Assessment

The report indicates that the development is relying on the ability of the incoming residents to access the existing Open Space for recreation. The report does not adequately consider strategic analysis Council has done in respect to the capacity for Active Recreation (i.e capacity has been reached). Nor does it consider what the capacity is for the existing passive parks in the area giving consideration to the cumulative demand of development in the area. The proponent should be asked to indicate what additional open space infrastructure is required to meet the demand being generated by

the proposal. This should be beyond those within existing infrastructure plans as the proposal is creating additional demand to what is outlined in those plans. This should refer to opportunities detailed in Council strategies and identify if these can be met through the additional Developer Contribution Funds being provided.

The communal Open Spaces proposed will not have a material impact on meeting the recreation needs of the incoming community.

The following concerns are being raised in regard to social impact of the development:

a. Inadequate Open Space

The communal Open Spaces proposed will not have a material impact on meeting the recreation needs of the incoming community.

b. Potential disruption to current residents' daily living patterns p.51 - 6.2.1.2)

The unmitigated impact is rated 'Medium Negative' and mitigated impact 'Low Negative' however the assessment does not demonstrate any clear or meaningful mitigation method to warrant the reduction of the impact. This impact should be considered as 'Medium negative' and mitigation measures should be incorporated as conditions of consent.

c. Demographic profile (p.51-52 - 6.2.2.1)

SIA highlights the lack of equity around access to communal areas, indicating affordable housing tenants will not have the same level of access as other residents. The SIA recommends testing approaches to ensuring equitable access to communal areas for affordable housing tenants. Ensuring (not testing) equitable access should be identified clearly as a condition of consent.

d. Increased demand for community services and facilities (p.53 - 6.2.3.1)

The unmitigated impact is identified as 'Medium Negative' and mitigated impact 'Low Negative'. The assessment demonstrates some level of mitigation, the provision of communal spaces and facilities to meet some of the needs of the incoming residents. However the needs of the incoming residents for all forms of social infrastructure, including schools, health facilities and services that will not be addressed through local development contributions. Given the size of the development and notable number of incoming residents, rating this a 'low' negative impact is questioned.

The provision of communal open space and some public domain improvements are noted and will meet some of the needs of the incoming residents for open space. However the proximity of the development to surrounding open spaces is not accepted as a mitigation measure as identified in the report. Given the size of the development, the number of incoming residents, increased demand and the existing lack strain on open space in the area, Council does not agree that the onsite open space provision proposed will result in a positive impact to the surrounding community as assessed in the SIA.

10. Vibration & Noise Assessment

The applicant is required to provide the following additional information to enable assessment of the proposal:

1. A revised noise assessment, prepared by a suitably qualified consultant that considers the operation noise of the common areas of the development. Considerations should consider the internal and external noise generated by the:
 - a. Wellness area (including clarification if this will include a gym)
 - b. Swimming pool
 - c. Games area
 - d. Golf simulator (including structural noise impacts)
2. Submission of the contamination assessments including the Preliminary site investigation (contamination) (PSI) / detailed site investigation (contamination) (DSI) (JBS&G, 2024), referenced in the groundwater Impact Assessment

11. Wind and other Impact on Open Space and Parks

The Wind Assessment indicates that the proposal will increase the wind velocity in the Southeastern corner of the Park. Mitigation Options for this issue should be identified and included with any conditions of consent for the development.

The area identified along Waterloo Road for setback associated with linear park should not include confirmed space for commercial purpose (i.e outdoor retail space). Use of this area should be confirmed by Council post development following application process and obtaining the necessary approvals. Design of area should allow for use of space as a linear park. This should be redesigned.

12. Arboriculture Impact

49 trees are scheduled for removal; these should be replaced on a 3 for 1 basis in accordance with the City of Ryde's Development Control Plan. As replacement is not shown to occur on site, a fee will need to be paid by the proponent for replacement plantings to occur at other locations within the LGA in accordance and should be set in accordance with Councils Fees and Charges.

The proposed impacts to biodiversity require further analysis and commitment to stronger mitigation measures. While the development is located in a highly urbanised area with limited direct impacts on native vegetation and habitats, the following issues need to be addressed:

13. Biodiversity Impacts

The report does not adequately address cumulative impacts from nearby developments or the issue of regional habitat loss and fragmentation in the Macquarie Park precinct. The cumulative impacts of habitat loss on identified threatened fauna species like the Grey-headed Flying-fox, Little Lorikeet, and microbat species are not fully assessed, including effects on population dynamics and regional connectivity. The assessment should include a detailed cumulative impact assessment, considering nearby development, regional biodiversity and impacts to connectivity from habitat

fragmentation, noting the location of the development between Elouera Reserve and Shrimpton's Creek Riparian Corridor.

14. Indirect Impacts on the Creek

Indirect impacts such as sedimentation, erosion, noise, dust, light pollution, and fertiliser drift are mentioned but not sufficiently mitigated. Further planning is required to ensure surrounding natural areas are not impacted during the demolition, construction and operation of the development.

15. Public Domain

The following public domain requirements will apply:

- a. Consideration shall be given for any opportunity to reduce the extent of on-street parking being lost due to the current design.
- b. Any additional street trees proposed for removal, which were not previously approved in LDA 2024/158 must be referred to Council Tree officers for assessment.
- c. Removal of all redundant driveway laybacks along Cottonwood Crescent.
- d. Road pavement reconstruction: - Cottonwood Crescent: Half-road width, full-depth reconstruction. Waterloo Road: One-lane width, full-depth reconstruction.
- e. Upgrade of footpaths along both frontages to granite paving.
- f. Reconstruction of all kerb and gutter along both street frontages. Proposed kerb alignments and profiles must demonstrate appropriate integration with existing infrastructure.
- g. Upgrade of street lighting – luminaires and columns to be replaced with Multi-Function Poles compliant with AS/NZS 1158 and the Macquarie Park Street Lighting Masterplan. Lighting must be powered by a metered supply.
- h. Upgrade of the existing bus stop (Stop ID: 2113213) on Waterloo Road to meet DDA compliance requirements.

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 -