



Lawrence Huang
Senior Planning Officer Assessments
Department of Planning, Housing and Infrastructure
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PARRAMATTA NSW 2150

21 April 2026

Subject: EIS Advice - Mixed Use Development at 15-21 Cottonwood Crescent, Macquarie Park (SSD-94006708) (City of Ryde)

Dear Lawrence,

Thank you for your email dated 20 March 2026 seeking advice from the Conservation Programs, Heritage and Regulation (CPHR) group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the State significant development application.

CPHR has reviewed the documentation and provides comments below and at Attachment A.

Biodiversity

The proposal involves significant tree loss with 49 removed and seven retained. Greater effort should be made to retain trees due to their environmental and amenity benefits. CPHR notes uncertainty regarding compliance with the City of Ryde Development Control Plan (DCP) (s7.4a v) setback requirements and recommends a 5m setback from Elouera Reserve to improve opportunities for tree retention.

Flood Risk Assessment

The proposal does not clearly state the flood design levels to be achieved and lacks details for the western swale and northern levee. Therefore it is unclear whether the site will be adequately protected from flooding. Emergency response arrangements are also vague, particularly given the increased number of residents, meaning both flood protection measures and flood response need to be clearly defined in the *Flood Impact and Risk Assessment* (FIRA) and design plans before determination.

If you have any questions about this advice, please do not hesitate to contact Khatera Tokhi Senior Conservation Planning Officer, via khatera.tokhi@dcceew.nsw.gov.au.

Yours sincerely,

Susan Harrison
**Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR EIS Advice on Mixed Use Development at 15-21 Cottonwood Crescent, Macquarie Park (SSD-94006708) (City of Ryde)

In preparing this advice CPHR has reviewed the following documents:

- *Environmental Impact and Rezoning Statement* (Urbis, 5 March 2026) (EIS),
- Appendix JJ - *Biodiversity Development Assessment Report* (RPS, 27 January 2026) (BDAR),
- Appendix SS - Council Advice - Pre-EIS - SSD Consultation (City of Ryde, 29 January 2026),
- Appendix AA - *Arboricultural Impact Assessment* (Martin Peacock Tree Care, 11 February 2026) (AIA),
- Appendix E - Urban Design Framework & Architectural Design Report (AJC, 23 February 2026),
- Appendix N - Landscape SSDA Application_SSDA Report (Place Design Group),
- Appendix U- *Flood Impact and Risk Assessment* 88 Waterloo Road Macquarie Park (Northrop, Revision A, 6 February 2026),
- *Appendix V-Stormwater Management Plan* 88 Waterloo Road Macquarie Park (Enscape Studio Studios, January 2026), and
- Appendix D - *Architectural Plans* 88 Waterloo Road Macquarie Park (AJC Architects, Revision A, 5 February 2026).

Biodiversity

Key Assessment Issues:

1.	<i>Plans to reflect AIA recommendations</i>	<p>Within the site trees 48, 49, 52, 53, 55, 56, and 58 will be retained, as well as two park trees 42 and 43, however, all will be subject to major encroachment. The AIA includes a number of mitigation measures to ensure retention.</p> <p>Recommended action: Include conditions of consent to require implementation of the mitigation measures outlined in the AIA, to ensure the ongoing viability of retained trees. Additionally, consideration should be given for the inclusion of the broader recommendations set out in Section 9 of the AIA.</p>
	<i>Extent and timing</i>	Prior to determination

Flood Risk Assessment

Key Assessment Issues:

2.	<i>Design levels</i>	<p>The design levels intended to protect the development from flooding are, in some locations, described as the higher of multiple criteria, such as 1% AEP Level, freeboard or PMF Level. However, the specific design levels required to meet these criteria are not clearly defined. This lack of clarity forms a risk that the required design levels may be misinterpreted by other parties.</p> <p>In addition, no design details have been provided for the swale along the western boundary of the site, nor for the levee or levee wall along the northern boundary. These details should be provided and the associated flood levels</p>
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		<p>clearly identified to ensure that the development will be adequately protected from flooding and overland flow.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • Determine flow levels for the western overland flow path and northern levee wall to inform updates to the site design. • Clearly define the flood immunity design levels in the FIRA and ensure design plans are consistent with these levels.
	<i>Extent and timing</i>	Prior to determination
3.	<i>Emergency response</i>	<p>Ambiguous statements such as <i>refuge is expected to be available above the PMF</i> should be replaced with clear and definitive statements that explicitly describe the required emergency response arrangements and confirm whether residents can safely shelter in place. This clarity is necessary to give the determining authority certainty about the level of risk posed to the residents by the proposed development. This is particularly important given the significant increase in population compared to the existing site.</p> <p>Recommended action:</p> <p>DPHI is satisfied that the flood emergency response measures proposed in the FIRA adequately address the increased risk associated with a larger population.</p>
	<i>Extent and timing</i>	Prior to determination

End of Submission