ATTACHMENT 1

City of Ryde Submission

BaptistCare Macquarie Park Masterplan- SSD-46561712

Concept proposal for the redevelopment of the BaptistCare site as a mixed-use development, including seniors housing, student accommodation, build to rent and build to sell residential flat buildings, a school, retail and community land uses.

Submission Date: 16 February 2023

EXECUTIVE SUMMARY

Introduction

Thank you for inviting City of Ryde Council to comment on the proposed Masterplan for the Concept State Significant Development (SSD) Application for the BaptistCare Site at 157 Balaclava Road Macquarie Park SSD-46561712.

The SSD Application seeks approval for the redevelopment of the BaptistCare site as a mixed-use development, including seniors housing, student accommodation, build to rent and build to sell residential flat buildings, a school, retail uses and community land uses.

Specifically, the application involves:

- A mixed-use development comprising a maximum GFA of 190,000m^2 dedicated to a range of land uses including:
    - Student Housing
    - Seniors Housing
    - Build to Rent
    - Retail
    - Residential
    - Mixed uses including commercial and allied health
    - A school
    - Maximum building heights and GFA for each development block
    - Public domain landscape concept, including parks, streets and pedestrian connections
    - Vehicular and intersection upgrades
- The proposed Masterplan includes 9 super lots accommodating the various land uses to support the precinct.

Council objects to the proposal in its current form.

Broadly, the application has not addressed the SEARs requirements, Council has not been consulted regarding any potential Planning Agreement, the high density and mix of uses proposed produce significant needs and challenges, as outlined in this submission. It is the view of Council that the proposal, in its current form, does not meet these needs and challenges and reconsideration and revisions are required before the proposal should proceed.

Key Issue Summary

In review of the Environmental Impact Statement (EIS) and supporting documentation a number of issues pertaining to the Concept SSD Application have been identified, including:

Consultation with Council

- The SEARS required that the applicant "consult with council regarding any potential Voluntary Planning Agreement (VPA) for the subject site, details of this consultation is to be included within the EIS". This consultation is essential to ensure the supporting infrastructure required can be delivered. Despite the clear requirement in the SEARs, this consultation has not been undertaken. The application must not proceed any further until this requirement has been appropriately addressed.

State Design Review

- The scheme should be submitted to the State Design Review Panel for a second review of the Masterplan. This is to ensure that the State Design Review Panel can assess whether the applicant has sufficiently addressed their concerns. It is the view of Council that the applicant has not addressed the State Design Review Panel's concerns in key elements of the proposal, particularly with respect to built form.
- The Applicant should consider the feedback provided by the Panel and address their feedback in the Response to Submission (RtS) phase.

Open Space and Masterplan Design

- The configuration and amount of open space requires reconsideration and revision to ensure a cohesive permeable open space network is provided.
- The proposed siting and layout of the Masterplan presents a number of challenges and revision of building separation and setbacks is required.

Floor Space Ratio and Gross Floor Area

- The Applicant's submitted Architectural drawings do not clearly detail the proposed gross floor areas of the proposed super lots.
- Further clarification is needed on the calculation of FSR for each super lot as what is currently shown appears to be incorrect.

Landscape and Arboricultural

- In its current form, the proposal contains a number of issues which collectively preclude support from a Landscape and Arboricultural perspective. Specifically, concerns are raised with regard to:
    - inadequate site deep soil area,
    - unresolved landscape design for the Vertical Village,
    - poor landscape design of the Central Plaza,
    - unclear definition of open space,
    - poor landscape design to the interface of retail areas, Epping Road and Macquarie University,
    - overall lack of landscape documentation, including basement extents and relevant landscape cross-sections.
- The Arboricultural information presented raises several issues including:
    - the overall scale of tree removal taking place,
    - failure to assess and document all construction related tree impacts,
    - inaccurate representation of tree removal, and

- lack of evidence to support tree retention.

Proposed road and land dedication

- As raised in Council's submission on the SEARs, the Applicant was to design the roads consistent with Council's DCP and include clarification regarding proposed dedication of roads to Council.
- The Applicant's EIS does not provide details of road dedication, nor have they consulted with Council on the delivery and dedication of roads.
- The Applicant is encouraged to consult with Council on the proposed roads, noting Council requires further information to ascertain whether the design and function of the proposed roads warrants dedication, or whether the roads would be more appropriately provided as private roads.
- The Applicant is to provide details of the east/west road connection, connecting with the remainder of Road 3 from the Morling College Site. The current Application does not clearly demonstrate the provision of this connection.

Traffic and Transport

- Additional assessments are required to be undertaken by the Applicant to consider alternative development scenarios.
- Further revision to the proposed parking rates in the EIS is required, as detailed in the recommendations outlined in a later section of this submission.

Flooding and Stormwater

- The education facility and aged care retirement living lies in the PMF flood extent area. It is recommended to reposition such critical infrastructure away from the PMF flood extent area or provide evacuation plans/strategies for these sensitive uses.

Council officers have undertaken a review of the Concept SSDA, the EIS, and associated supporting Appendices and provide the following more detailed comments.

Detailed Explanation of Issues

1. Open Space

a. Residential Open Space Provision and Design

- Clarification is needed on the level of public accessibility in all the internal spaces. The Masterplan layout is to identify the following:
    - Publicly owned and publicly managed spaces (if any).
    - Privately owned spaces with a public right of way to allow public recreational uses 24/7.
    - Communal open spaces with controlled access for future occupants only.

- Clarification is needed on whether the proposed 'local parks' (see page 48 of Appendix E Architectural Urban Design Report) are privately owned publicly accessible spaces or public parks that will be dedicated to Council. If these spaces are intended to remain privately owned, the Applicant is to confirm whether a public right of way will be provided to secure public accessibility in these spaces.

- Some proposed public open spaces are considered unlikely to function successfully as public space as they are surrounded by residential towers and are likely to be perceived as a communal open space for residents only. Additional information should be provided demonstrating how the public open space will be accessible and engaging for the wider community.

- Some private communal open spaces are poorly located adjacent to Epping Road, exposing the spaces to a major source of noise and air pollution as shown in Figure 1 (see page 45 Appendix E Architectural Urban Design Report). The front setback zones to Epping Road should be primarily used for deep soil tree planting and a green buffer. Reconfiguration of private open space to ensure it is not interfacing Epping Road is recommended.

Figure 1: Extract showing proposed open space (Source: Appendix E Architectural Urban Design Report page 45)

- Clarification is needed on the definition of “active” public space on page 46 of Appendix E Architectural Urban Design Report, as active open space usually refers to lands used for formal outdoor sports. The information provided does not demonstrate that the space will function as active open space. Given the density and uses proposed, further details should be provided to demonstrate how the active recreation needs generated by the development are to be addressed.

- There is a lack of deep soil in the proposed civic plaza, along the northern site boundary and in the Vertical Village site (see page 34 of Appendix N Landscape Design Report). The location of deep soil also does not consistently relate to the street tree planting locations illustrated in pages 51 to 52 of the Appendix E Architectural Urban Design report. The northern side of the east-west street particularly lacks deep soil to support future street trees behind the kerb. Further deep soil planting should be provided, particularly in relation to the Stage 1 Vertical Village site

- The proposal contains several unique and diverse land uses and this causes challenges when planning and designing the open space network within the site. This is further compounded by the proposed density of the building envelopes and the minimal amount of land identified for open space use. Given the proposed density of the precinct, larger open spaces should be considered.

- To achieve a more liveable outcome for future residents, fewer and more slender buildings would result in the open space being able to be more tailored to the varied requirements of the proposed land uses.

- By tailoring the open space to the proposed uses within the site, there is a greater opportunity for the spaces to be designed to provide a function for the broader community and not just the residents of the site.

- The proposed ‘pocket parks’ will only provide function and utility for the residents of the new development and dedication of these types of spaces to Council is not supported. Further consideration into larger open space parks that provide a wider community benefit should be considered.

- Should smaller open spaces be proposed in the Development Application, during the assessment, public access easements to these open spaces will need to be conditioned.

- DPE and the Applicant should consider how the proposed open space will be maintained in an effective manner to ensure no future burden is placed onto Council if this land is not suitable to be dedicated to Council. Details of this should be clarified in the Response to Submissions (RtS)

- The design and elements included in the open space(s) should align to best practice including design guidance provided by NSW Government Architect and Council’s Integrated Open Space Plan.

- Consistent with City of Ryde *Open Space Future Provision Strategy*, all residents are to be within 200m of an open space greater than 1,500m^2, with a preferred minimum of 3,000m^2 for optimum usability.

- Given the densities proposed and the scale of the site, the 3,000m^2 minimum should be used. The open spaces must receive the minimum DCP controls for solar access.

- More detailed information should be provided to confirm what level of solar access can be achieved on the winter solstice in the 5 main open spaces proposed in the masterplan (including internal courtyards proposed for private residence).

- The Macquarie Park DCP Control 8.2(e) requires that *"Solar access to communal open spaces is to be maximised. Communal courtyards must receive a minimum of 3 hours direct sunlight between 9 am and 3 pm on the 21st of June."* It is currently unclear if the proposed open space will satisfy the solar access provisions. Detailed solar diagrams should be provided demonstrating compliance.

- The proximity of residents to active recreation areas of the open space networks needs to be further considered to ensure there is suitable capacity to meet the additional demand this development will bring. The currently proposed location of the playground (Play Park) nestled amongst Buildings L, M & O is not supported as it contains a number of footpaths and pavings, rather than a consolidated open space. Further refinement of the Play Park is recommended to have less footpaths and paving and more open space.

- The proposed vegetation palette is to be further refined to improve the ratio of natives to exotics. The proposal to include exotic plants within the aquatic and streamside palette is not supported given the ability of exotic plants to be transported along the water course which flows through Lane Cove National Park. Further refinement of the proposed vegetation pallet is recommended.

- The built form and the proposed open space network should be revised to maximise passive surveillance into open spaces to eliminate areas with visual obstruction.

b. School open space design

- In Appendix Q, Social and Economic Impact Assessment, there is little detail regarding the specific demographic and need proposed to be addressed. Given the need to ensure any school on the site is appropriately designed, and is supported by sufficient open space, the demographic details of the underlying need and the associated open space requirements should be more clearly articulated.

- The EIS suggests the primary school would cater for up to 1000 students. The provision of the school and the associated space to cater for outdoor recreation use should comply with the requirements of NSW Department of Education for new schools, particularly the DG10.3 Open Play Space Requirements of 10m^2 per student.

- Applying the open space requirements of 10m^2 per student would equate to 10,000m^2 of open space. In review of Appendix N Landscape Design Report, it is suggested that there is 0.22 ha (2200m^2) of open space allocated to the school (Figure 2), this results in an unacceptable shortfall of open space allocated to the school. Additional open space should be allocated to the school or a reduction of students to match the proposed open space is recommended.

- The Applicant should consider the location of elements within the school open space that could also be made available to the general public such as basketball/multi-purpose courts. These should be located on the ground plane and made available outside of school operating hours as this would provide a wider benefit to community members in the precinct.

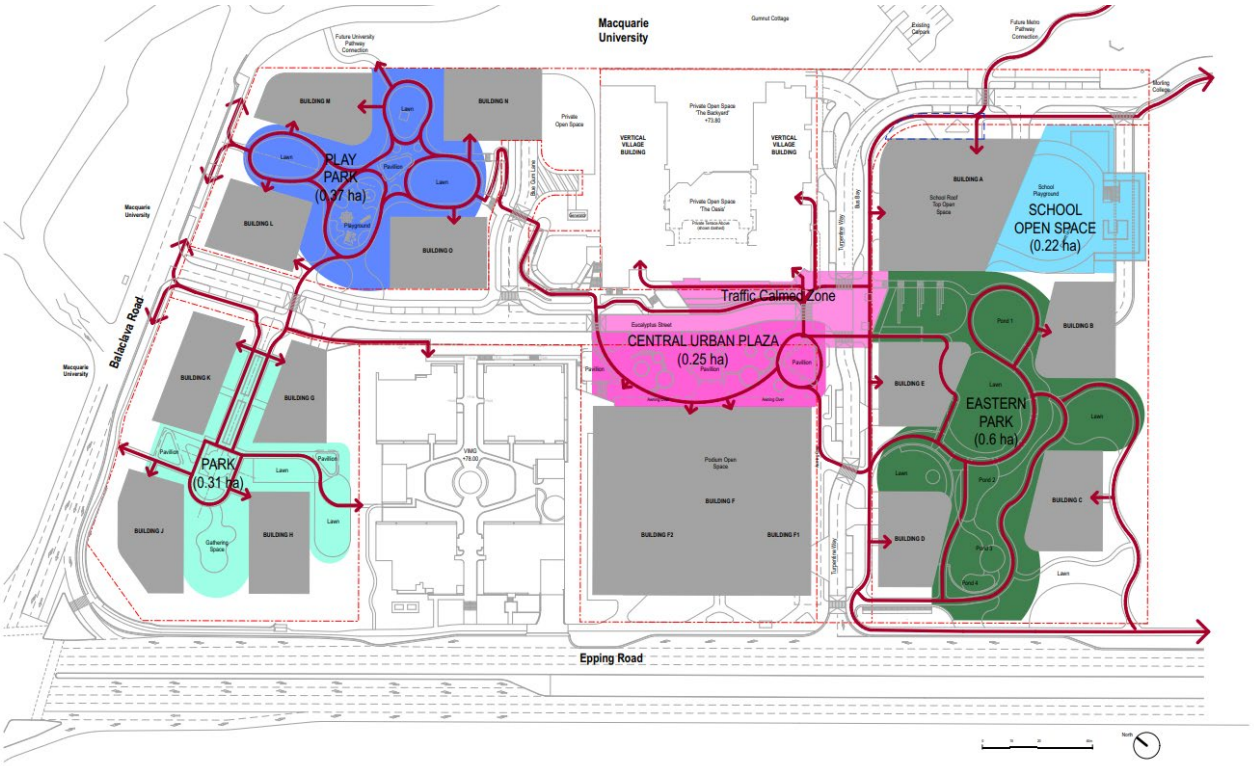


Figure 4.12 - Diagram illustrating the primary open space and parkland areas created as part of the Landscape Design and Conceptual Master Plan layout

Figure 2: Extract from Landscape Design Report outlining proposed Open Space (Source: Appendix N, Page 31)

c. Landscape and ESD

- An allowance for the planting of trees to achieve a minimum 40% canopy coverage through the site when the trees are at maturity needs to be made. Currently the design shows a 39% coverage, which does not meet the minimum 40% canopy coverage requirement.

- Environmentally Sustainable outcomes for the open space networks should be further enhanced. Elements, such as water harvesting for open space irrigation, should be included. Again, subject to the final design of these spaces, unless a broader community need is met Council will not accept dedication of this infrastructure.

2. Urban Design and Masterplan

It is noted that the Application has been reviewed once by the SDRP on the 6th of June 2022. Council requests that in the RtS phase the Applicant responds to the SDRP's comments.

Council requests that the Application be submitted to the State Design Review Panel (SDRP) for further design comments. Council considers it necessary that further review from the SDRP of the proposed Masterplan is undertaken to ensure Council's and the Panel's concerns have been appropriately addressed.

Council's Urban Design issues are outlined below and should be addressed by the Applicant.

a. Site Configuration and Masterplan Layout

- The current configuration, which largely consists of free-standing high-rise towers surrounded by space, creates 'negative spaces' that cater for movement or lack clear function rather than promoting and facilitating congregation. Reconsideration from a place quality perspective is required and revisions should ensure the configuration and surround space provides places that encourages people to dwell, congregate and socialise.

- The spatial planning of the site must consider security and privacy while enabling public walking permeability through the site. The current spatial arrangement of the building envelopes lacks a clear definition between public and communal open spaces. Given the need for some privacy and security, some space, such as internal courtyards within each neighbourhood, may be better designed as communal open space rather than public space. Communal open space is best defined by building frontages rather than boundary fences, walls or landscaping to provide passive surveillance and activation.

- The dimensions of the internal spaces should be more generous to creating high-quality, social spaces. The majority of the proposed spaces appear to be produced merely in compliance with the minimum building separation requirements by the Apartment Design Guide (ADG). More generously sized consolidated space can be created by amending the geometry, orientation or size of the building envelopes. For instance, the mixed-use neighbourhood will benefit from orientating Building H to align with Epping Road to create a larger central courtyard space.

- The placement of the school playground immediately adjacent to the existing residential area might cause noise impacts on neighbouring residents. The Applicant is advised to consider swapping the location of the school with the Vertical Village to achieve the following advantages:

    - Minimising noise impact on neighbours to the southeast.
    - Significantly improving solar access to the civic plaza by having a lower building to the north of the plaza.
    - Providing more human-scale to improve the built form's relationship to the plaza.
    - Providing compatible uses adjacent to each other – retirement living adjoining existing residential while a school adjoining the existing childcare centre.
    - Reinforcing the civic character of the new plaza by co-locating an institutional building (school) and the retail/commercial hub to maximise street-level activation.
    - Creating a distinct civic cluster at the centre of the site and reinforcing the quieter living neighbourhood character on the eastern and western sides.

- The view corridors diagram in Figure 4.11 of Appendix N Landscape Design Report mostly considered vantage points from the view angles of vehicles; it is critical that view connections are carefully considered from a pedestrian's perspective and from important open spaces. Further consideration is required in this regard and should be included in an updated report.

- The geometry and orientation of building envelopes need to be refined to improve the direct visual connections to the waterbodies from the civic plaza (see Figure 3).

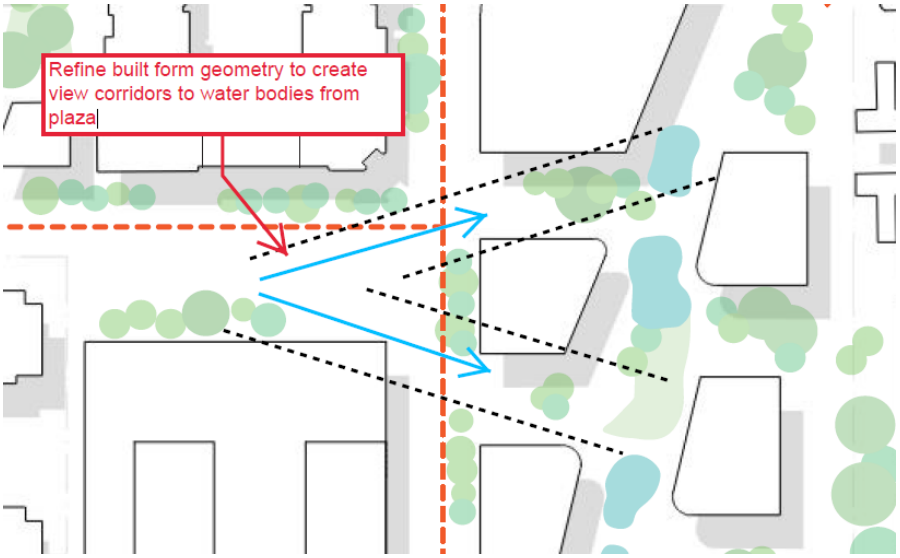


Figure 3: Mark up of Appendix N (Base Source: Appendix N, page 30)

- The retail/commercial/conference centre component (Building F) should provide an active frontage to the north-south new street and a legible and activated corner presence to Epping Road. Considering that it is the entry point from Epping Road a more inviting arrival experience should be provided.

- In review of the setbacks proposed under Appendix E, the Masterplan proposes buildings that are non-compliant with the ADG building separation distances. The Applicant addresses this through alternative means such as building orientation to prevent direct sightlines and screening. This is however a poor planning and design outcome as it will result in compromised amenity for future residents. Of key concern are the proposed setbacks of superlot 9 (Figure 4). Further clarification on building separations and building siting is required and compliance with ADG is required.

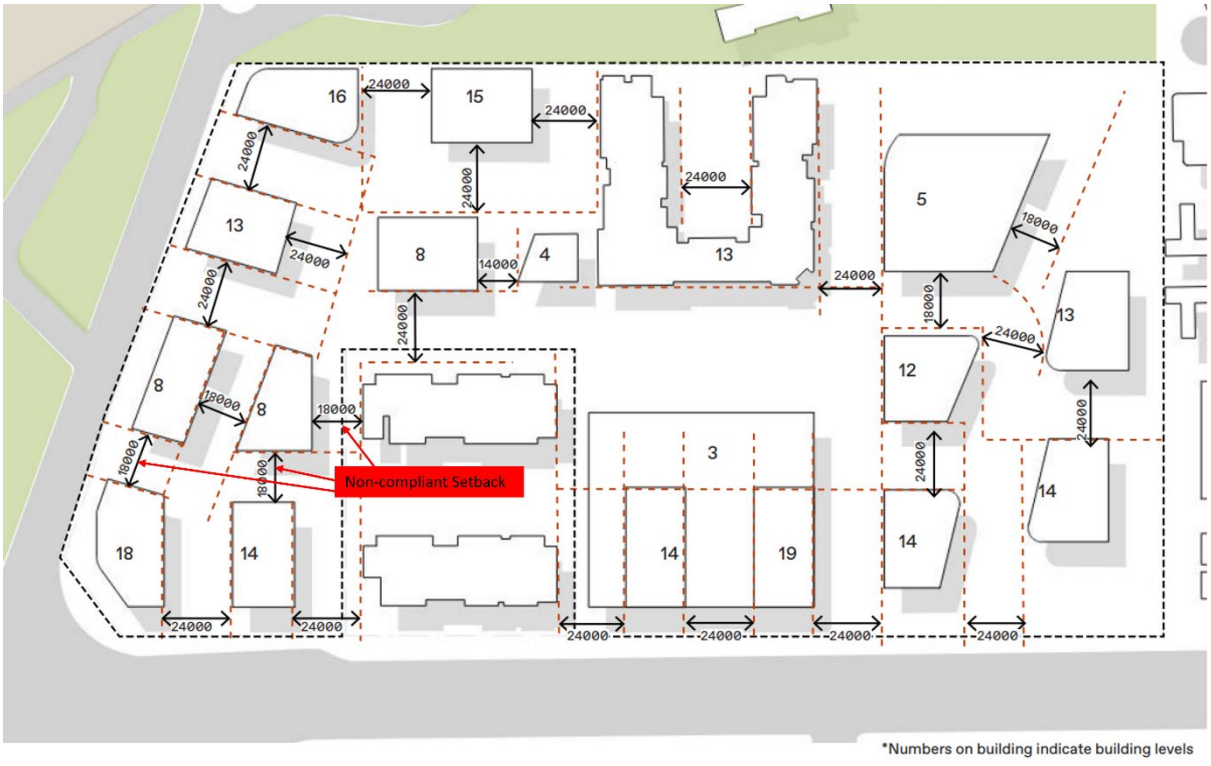


Figure 4: Mark up of ADG Separation (Source: Appendix E page 70)

b. Setbacks to Macquarie University

- The proposed setbacks to the northern boundary are inadequate and could cause potential adverse impacts on the neighbouring site.

- The adjoining University land is publicly accessible and has the character of a park. As such the minimum ADG separation with deep soil tree planting should be provided from the northern boundary as guided by Macquarie Park DCP Control 7.4(a)(v).

- The Applicant is advised to liaise with the University and refer to the University Masterplan to understand potential future development scenarios to the north. Greater setbacks are likely to be required, to ensure the site outcomes arising from this proposal do not conflict with the future development on the university site.

- In review of the Macquarie University Design Excellence Strategy and Urban Design Guidelines, the approved Masterplan for the University site, will have built form proposed opposite the BaptistCare site (Figure 5).

- The current setbacks for the stage 1 site, Building M and Building N proposed on the northern boundary does not allow for sufficient room to enable screen planting and appropriate separation between buildings. The reliance of planting on the Macquarie University site to screen the subject development isn't an appropriate outcome.

Figure 5: Markup of Figure 30 of the Macquarie University Design Excellence Strategy and Urban Design Guidelines (Source: Macquarie University Design Excellence Strategy and Urban Design Guidelines, page 139)

- The BaptistCare site will have a direct interface with Precinct E (Figure 6) under the Macquarie University Masterplan. Further refinement of the proposed BaptistCare site layout is needed to ensure that it will be compatible with Precinct E, at this interface.

- Figure 7, shows the proposed built form of Lot E8, which will be directly facing superlots 1,3 and 4. The built form proposed on the northern boundary, facing the future built form of Lot E8, will create unacceptable amenity impacts on the future buildings on Lot E8. Further separation from the northern boundary is required and the ADG separation distances should be applied.

- The current Masterplan has not considered the future built form of surrounding sites adequately and further information is required to address the future built form outcomes.

Figure 6: Mark Up of Site interfacing with Precinct E (Base Source: Macquarie University Design Excellence Strategy and Urban Design Guidelines, page 198)

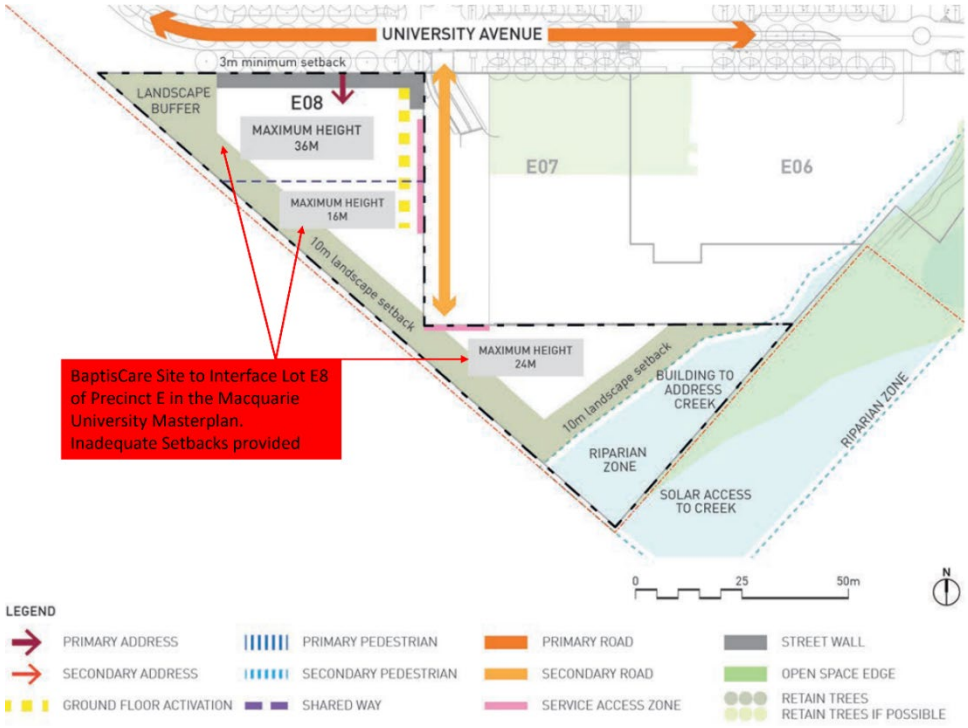


Figure 7: Diagram of Proposed Lot E8 (Base Source: Macquarie University Design Excellence Strategy and Urban Design Guidelines, page 203)

c. Access and Connections

Pedestrian & Cycling

- Clarification is required on the level of public accessibility of the internal pedestrian/cycling network. The master layout plan should identify the following:

    - Proposed publicly owned and publicly managed connections, if any.
    - Privately owned connections with a public right of way to allow general public access 24/7.
    - Privately owned accessways with controlled access for future occupants.

  It is critical that the above is carefully considered at the concept masterplan level as it will have an implication on the built form response and the arrangement of the building envelopes and open spaces.

- Creating new pedestrian access points to the neighbouring site and improving walking permeability through the site is supported in principle. However, providing public access traversing the central courtyard of each neighbourhood would not be an appropriate approach. Consideration should be taken to balance privacy, security, amenity and public accessibility. Public connections are best provided along the edge of each neighbourhood.

- The Applicant is to clarify whether the proposed pedestrian access points to the University and neighbouring residential areas are accessible to the public 24/7 or restricted to limited hours of the day or users. Clarifications are also required as to whether consent from the neighbouring sites has been obtained to enable these access points.

- There are level differences at the site boundaries with the adjoining sites. The Applicant is to clarify how level changes will be dealt with to ensure future access points to neighbouring sites can be provided.

- The landscape plan shows that an existing pedestrian footpath from the Gumnut Cottage car park connects to the subject site and meets the proposed car park entry of the Vertical Retirement Village. This leads to conflicts between pedestrian and vehicular movements and safety concerns. A better site access arrangement is required to minimise pedestrian/vehicle conflicts.

- A publicly accessible pedestrian connection should be provided to the existing bus stop (ID: 2113238) on Epping Road.

- The alignment of connections for cycling and pedestrian access in the Appendix N landscape design report (see pages 30 to 31) is inconsistent with those shown in the Appendix E Urban Design report (see pages 42 to 43). These reports should be updated to ensure all information is consistently presented.

  Vehicles

- Roads to be dedicated to Council must have a minimum road reserve of 20m to comply with the Macquarie Park DCP requirements. The Balaclava Road entry on plan appears to have a road reserve width of 19m only. The future connection to the Morling College site has a road reserve width of approximately 18.5m. Clarification is required as to which roads are proposed to be dedicated to Council, noting that Council would not be accepting the currently proposed roads as public roads.

- It is important that the proposal provides public accessibility 24/7 on the new east-west and north-south streets (Eucalyptus Street and Turpentine Way). This could be achieved by providing a public right of way on these streets.

- The visual quality of the east-west street (Eucalyptus Street) can be improved by avoiding having car park entries directly opening to the street; private access roads with widths commensurate with a low-speed environment (e.g. shared zone) are recommended off the east-west street to provide vehicle access to basement car park. This will minimise the visual impact of car park entries and provide a continuously landscaped urban environment along Eucalyptus Street.

- In Appendix F Civil Concept Design, the Applicant is proposing Road 3 with a cul-de sac and no linking with the portion of Road 3 connecting from the Morling Collage site. The Applicant's Stage 1 works, show the road falling short of the connection from Morling Collage (Figure 8). Further clarification and design plans showing the connection with Road 3 from the Morling Collage site is required.

Figure 8: Proposed Stage 1 Road Works (Source: Appendix F page 8)

- The information provided does not demonstrate consideration has been given to the level difference between the subject site and the Morling Collage site with respect to connecting the Road. Additional plans need to be submitted demonstrating the connection can be made given the difference in ground level between these sites.

- Council notes that Appendix F includes "potential connection plans" (refer page 42, drawing reference C402) and this is not considered acceptable. If an agreement is not established between the Applicant and Morling Collage, Road 3 may not be constructed to connect to Balaclava Road. The Applicant is to provide details of further consultation with the adjoining

landowner in establishing an agreement to deliver Road 3 with additional plans showing the staged delivery of the Road 3 connection.

d. Building Heights and built form

- The building height diagram in the Urban Design report (page 72) has not considered any potential lift overruns, parapets, roof form design features and plant rooms (if any) on the roof level. The diagram underrepresents the actual extent of non-compliance in the LEP height controls. Should any communal open space be proposed on the roof level, greater building heights will be required to accommodate the lift overruns and, potentially, shade structures, exceeding the LEP height plane even further. Additional information and/or revision is required to address this.

- Should additional building height occur from responding to the above point, an amended clause 4.6 request would be required for further assessment.

- Provision of approximate RLs is requested in conjunction with the heights in metres to ensure the distribution of height in relation to the topography is clear and can be assessed.

- As raised by City of Ryde in the previous meeting with the Applicant, there are opportunities to provide lower-scale built form (e.g. podiums) to define and shape internal open spaces and to create a more human-scale streetscape on the ground plane. This advice aligns with the comments made by the State Design Review Panel (SDRP). Some floor space can be redistributed from the high-rise tower to the lower-level podiums, potentially reducing the height of the towers at some locations.

- The proposed point tower forms with unarticulated façades coming down to the ground increases the wind impacts on the ground plane. This is evident in the Wind Impact Assessment report (Figure 9) showing several locations will have a moderate to high wind activities, which is considered too windy for comfortable amenity use. The wind impacts at many locations along Balaclava Road exceed the safety threshold due to potential localised strong winds. Consideration should be given to having towers sitting above low-scale podiums with secondary setbacks to help mitigate the downwash winds; this is also recommended in the Wind Impact Assessment report.

Figure 9: Figure 10 from Appendix U showing Expected Wind Conditions within the Proposed Masterplan (Source: Appendix U, Page 11)

- Council notes an inconsistency between the Architectural Plans and Appendix E. The Architectural Plans do not show the proposed storeys for the retail podiums as demonstrated in Figure 10.

- The Architectural Plans (markup shown at Figure 11) should be amended to be consistent with the proposed levels under Appendix E, as shown in Figure 10

Figure 10: Proposed building heights in Storeys/Levels (Source: Appendix E, Page 65)

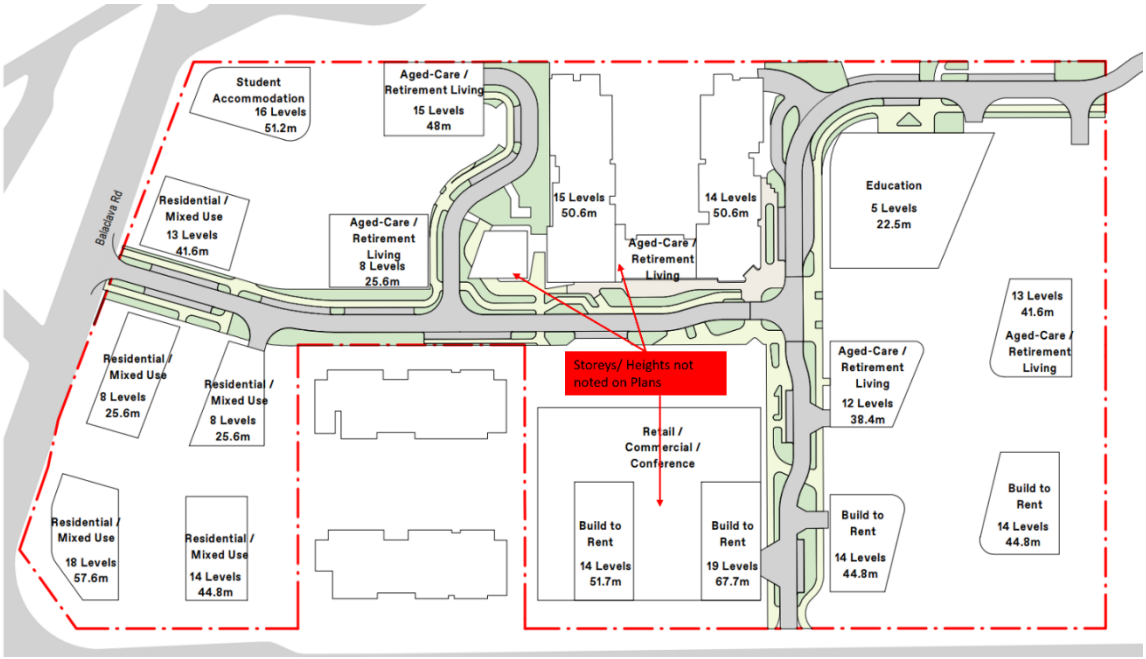


Figure 11: Markup of Architectural Plan Set (Base Source: Architectural Plan Set, Page 1)

e. Floor Space Ratio and Bulk and Scale

i. Floor Space Ratio

- The Masterplan seeks a maximum cap of 190,000m^2 of GFA allotted to the masterplan consistent with Figure 12.

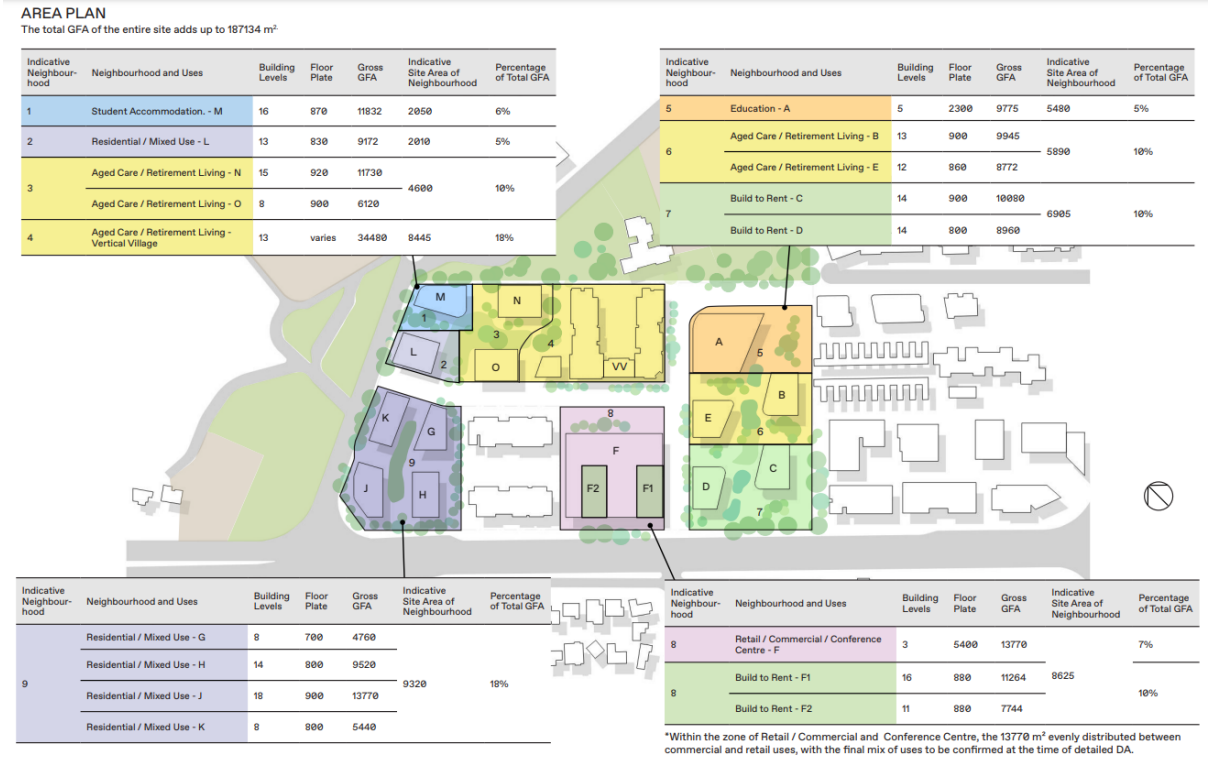


Figure 12: Proposed GFA Plan (Source: Appendix E, Page 68)

- Council notes that an FSR of 2.5:1 would net a 160,000m^2 of GFA. However, the Applicant is intending to use FSR bonuses to achieve additional 30,000m^2 of GFA. Council requests a mechanism be imbedded into the SSD Application that ensures the additional GFA (If approved) is to be used for the specific purposes that trigger the bonuses. The Architectural plans should be amended to specify which uses are utilising the bonus GFA. If these uses are not provided in those locations, then the GFA should revert back to the maximum allowed with no bonus applied and the GFA removed accordingly.

- The Applicants calculations for GFA appear incorrect. Using Superlot 3 (Seniors living) as an example the following would apply:

  <u>Superlot 3 calculation</u>:

  - 4600m^2 (site area) x 2.5:1 (base FSR) + 25% (Bonus FSR) = 14,375m^2
  - The Applicant has arrived at a figure of 17,850m^2, which is 3,475m^2 higher than what would be permitted.

- The Applicant should provide detailed calculations of FSR, including how they ascertained their values. FSR should be calculated in accordance with Clause 4.5 Calculation of floor space ratio and site area of the RLEP 2014.Updated calculations (including methodology) identifying the correct GFA allocated to each superlot should be provided.

- The Applicant applies the proposed FSR as a total amount to the site, resulting in a proposed 2.93:1 FSR. However, in certain superlots, the FSR significantly exceeds 2.93:1, as shown in 13.

- It is recommended that an FSR/GFA portion plan (amended to correct calculation errors in the current proposal) is provided on the Architectural Plan Set, outlining the suggested GFA allocated to each superlot to guide future development (an example of this is shown on 14). Including this on the Architectural Plans would provide greater clarity around future applications for built form outcomes on the sites

Table 15 Proposed GFA and corresponding FSR

Superlot	Superlot area (m²)	Use	Base FSR	Bonus	GFA	Proposed FSR (X:1)
1	2,050m²	Co-living (student accommodation)	2.5:1	10%	11,832	5.77
2	2,010m²	Residential	2.5:1	0%	9,172	4.56
3	4,600m²	Seniors	2.5:1	25%	17,850	3.88
4	8,445m²	Vertical Village Seniors	2.5:1	25%	34,480	4.08
5	5,480m²	School	2.5:1	0%	9,775	1.78
6	5,890m²	Seniors	2.5:1	25%	18,717	3.18
7	6,905m²	BTR	2.5:1	0.2:1	19,040	2.76
8	8,625m²	Retail	2.5:1	0%	13,770	1.59
		BTR	2.5:1	0.2:1	19,008	2.20
9	9,320m²	Residential	2.5:1	0%	33,490	3.59
Total site area					**63,871m²**	
Total potential GFA and FSR					**187,134m²**	**2.93:1**

Figure13: Proposed GFA & FSR (Source: Table 15 of the EIS)

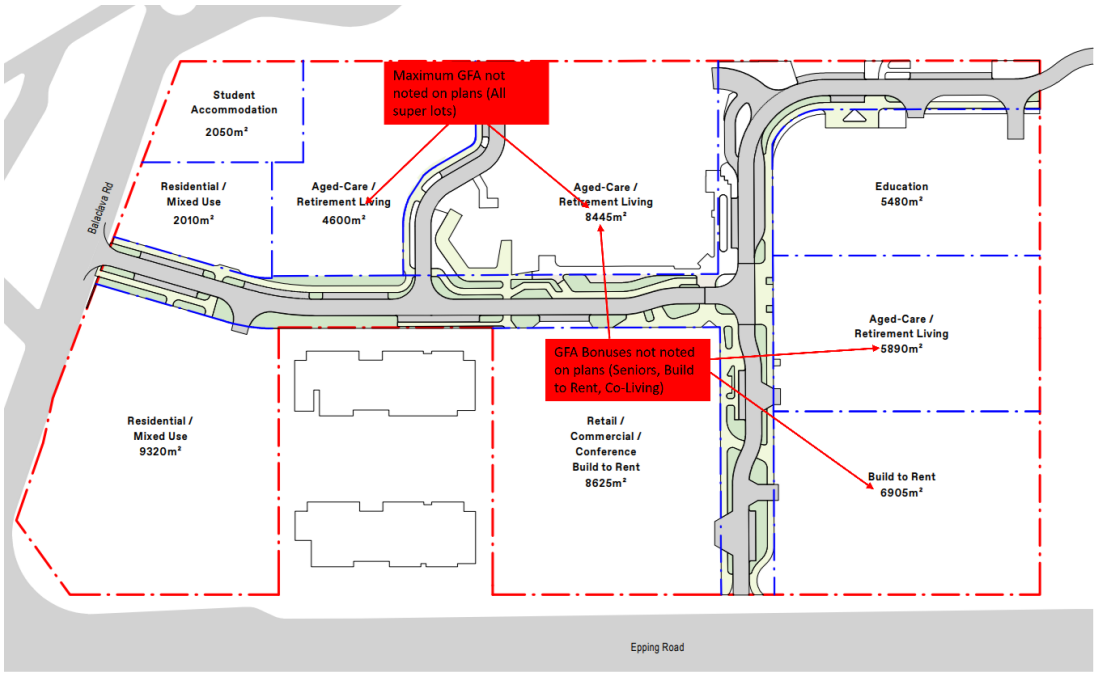


Figure 14: Markup of Architectural Plans (Base Source: Architectural Drawing Page 2)

Bulk and Scale

- The dimensions of some building envelopes are inappropriately excessive and further refinement of the building envelops is recommended.

- The Vertical Village Buildings have a maximum building length of up to 73m with a height of 14 to 15 storeys. Further articulation in the built envelope is required to reduce the perceived bulk and scale of the building, particularly noting impacts on Lot E8 on the Macquarie University site.

- The ADG recommends a maximum building depth of 18m from glass-line to glass-line, whereas Buildings B, C, E, L, O and N each have a building depth varying from 26m to 29m; and Building J has a building depth of 24m. Revision is recommended.

- The school building envelope has a maximum dimension of over 50m and a minimum building depth of 38m. The building form might not be conducive to optimising natural daylight and ventilation access to the floor space. The Applicant is advised to consider a perimeter block configuration with reduced building depths to improve access to daylight and cross ventilation as well as to contain the noise from the school playground.

- The proposal has assumed a typical floor plate efficiency of 85% across the whole site (see page 66 of Urban Design report). Based on City of Ryde's experience in assessing similar developments, this level of efficiency seems unusually high for any typical mixed-use or residential development. City of Ryde staff's preliminary testing based on the proposed indicative floor plan layouts on page 69 of the Urban Design Report found that the typical efficiency of the buildings is only around 76% to 78%. The proposed building envelopes are too tight, and there is no flexibility in the envelopes to allow for built form articulation at the future DA stages. It is requested that the DPE seeks a revised calculation that more accurately reflects the achievable floor plate efficiency.

- The massing of the towers needs further refinement to minimise the impact of building bulk on some viewpoint locations – e.g. viewpoint locations no.2 and 3 westbound along Epping Road and no. 05 at the corner of Balaclava and Epping Roads propose extensive building lengths are highly visible.

- Configuring the school in a perimeter block form will assist in defining its interface with the public domain and reduce the need to provide extensive high fences along the boundaries.

- The proposed street setbacks from the future east-west and north-south new roads are generally less than 3m. Such a street setback distance on the ground floor level might not be sufficient, subject to ground floor use. Should ground floor apartments be provided, a minimum setback of 5m should be provided to help maintain the visual privacy of the ground floor apartments.

3. Landscaping and Arboricultural

a. Landscaping

i. Vertical Village Open Space Design.

- There has been no information provided in relation to the landscape and open space design associated with the Vertical Village. Additional information should be provided in this regard.

- Given the scale of this component of the masterplan and density of the built form, it is critical that resolution of this portion of the proposal is achieved to ensure that the common open space and landscape arrangements are high-quality, well considered and appropriate for the proposed land-use.

ii. Civic Plaza Design.

- Further resolution of the landscape design for the Civic Plaza is required. The large expanse of hard paved area with minimal landscape interventions or embellishments fails to provide an appropriate level of amenity, functionality or activation for a central civic plaza space associated with a development of this scale.

- Additional deep soil and soft landscaping must be provided within the space to ensure a positive landscape outcome that delivers a central hub that is useable, enlivens the public domain and supports a variety of uses. This is to include additional planting, infrastructure, facilities, lighting and public art that meets the needs of residents, workers and visitors to the precinct and responds to the unique natural character of the Macquarie Park Corridor.

iii. Rooftop Green Spaces.

- No landscape information has been provided pertaining to the rooftop green spaces and communal areas. As demonstrated within the architectural visualisations, a number of buildings contain rooftop green spaces, however, the landscape documentation has failed to consider or appropriately detail these areas.

- To facilitate consideration of the open space available to residents of the site and whether it is sufficient, greater detail is required to confirm how these spaces are proposed to function.

iv. Deep Soil Area.

- Insufficient deep soil area has been afforded as part of the proposal. As per the Landscape documentation provided, deep soil areas (with minimum dimensions of 20m x 10m with a 2m depth) represent less than 10% of the total site area and fail to achieve compliance with the minimum 20% requirement as specified under Section 8.2 (a) of Part 4.5 of RDCP 2014.

- In the Deep Soil Area diagrams within the landscape plans, calculations noting compliance with the minimum 20% are inaccurate given the inclusion of numerous areas which do not meet the minimum dimensions to be classified as deep soil.

- The overall lack of large, consolidated areas of deep soil across the site is unacceptable for the scale of the development resulting in a poor landscape outcome for the development, which fails to meet the deep soil objectives outlined in Section 8.2 of Part 4.5 of RDCP 2014.

- In addition to the above, the Vertical Village component of the proposal appears to provide no deep soil area (Figure 15) given the likely extent of the basement and podium. This fails to achieve compliance with the Section 3E of Part 3 of the ADG.

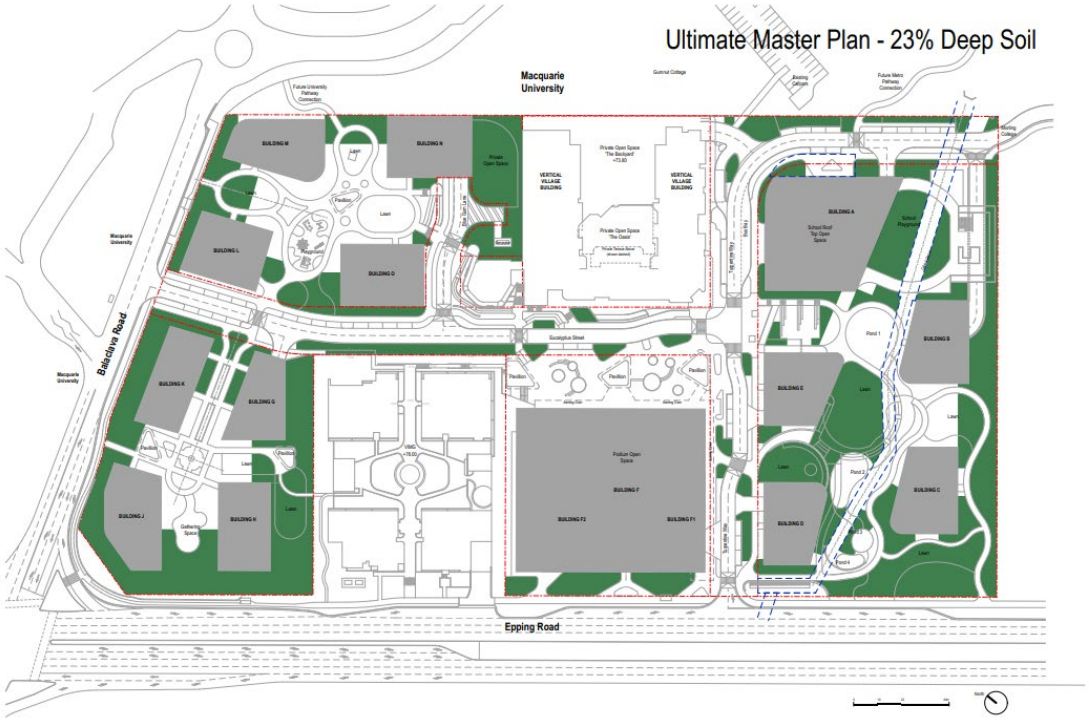


Figure 13: Proposed Deep soil Zones (Source: Appendix N Landscape Design Report)

v. Basement Extent Clarification.

- The documentation submitted provides minimal information regarding the extent and design of basements. As such, the extent and suitability of deep soil, landscape area, podium planting, tree planting and impacts to existing trees cannot be accurately assessed.

- Detailed documentation that fully outlines the proposed layout, depths and locations of all basements across the site inclusive of basement entry and egress points should be provided.

vi. Retail Interface Landscape Design.

- The landscape design has failed to consider the ground floor retail uses as proposed within the Architectural drawings. A number of buildings including B, C, D, G, K, L, M & O contain retail uses at the ground floor level with an interface to the street and open space areas, however, the landscape design fails to consider their relationship.

- Further design resolution is required between the architectural and landscape design to ensure workable and functional retail edge treatments that complement the overall use and character of the development.

vii. Macquarie University Interface Landscape Design.

- The landscape edge treatment to the north-eastern boundary with Macquarie University is a poor outcome that offers no landscape setback and provides an unsatisfactory interface to the neighbouring properties. Revision is required.

- No consideration has been given to providing appropriate planting buffers to the boundary to ensure a positive relationship between the land uses that is commensurate with the scale of the built form and overall development.

viii. Epping Road Interface Landscape Design.

- Landscaping within the Epping Road setback to Building P1 and P2 has not been effectively designed to provide large contiguous tracts of deep soil to support large canopy tree plantings commensurate with the scale of the built form.

- The extensive hard paving and pathway layout precludes an effective planting buffer resulting in a landscape scheme that does not enhance the amenity of the streetscape and fails to effectively screen the building mass when viewed from Epping Road.

ix. Level Information.

- The Architectural and Landscape documentation submitted fails to provide a detailed representation of proposed external design levels associated with the development. A significant number of required external spot levels have been omitted from the plan documentation provided, which has prevented assessment of the adequacy of surface levels, retaining walls, stairs, ramps and podium planting across the entirety of the subject site.

- No landscape cross-sections or elevations have been provided to demonstrate the spatial suitability of proposed landscape elements including their relationships with the proposed built form and existing site and boundary levels.

b. Arboricultural

i. Scale of Tree Removal.

- The scale of tree removal set to occur as a result of the overall masterplan is not supported. With the exception of concentrated areas of trees within the neighbouring allotments and within the north-western and south-western corners of the subject site, there has been minimal attempt to maintain existing trees throughout the proposed scheme.

- Given the size of the site and the NSW Government commitment to achieve 40% urban tree canopy, the tree removal and replacement should be reviewed to deliver a canopy cover consistent with the State objective at a minimum. Refer to North District Plan (p.108) and Planning Priority E2.3 of the Ryde Local Strategic Planning Statement.

- Of particular note, multiple trees of ‘Medium’ to ‘High’ retention value located within the central portion of the site as well as a large number of trees, which form a continuous buffer along the Epping Road frontage, are proposed to be removed.

- The overall level of impact to be sustained by existing trees and the actual extent of tree removal is considered to be inaccurate. The Tree Location Plans held at Appendix 4.1 of the report do not reflect incursions to Tree Protection Zones (TPZs) and Structural Root Zones (SRZs) as a result of proposed external hard paving areas, stormwater infrastructure or site grading works.

- Given these works are extensive and likely to result in extensive impacts to existing trees, detailed re-assessment of all tree impacts is required to ensure a true representation of tree removal required to facilitate construction.

ii. Impacts from Bulk Earthworks.

- The extent of impact from the proposed bulk earthworks on trees to be retained has not been fully considered. Several trees have been nominated for retention despite falling within the footprint of proposed bulk earthworks as detailed within the Civil Engineering Plans prepared by JN Engineering, Revision 3 dated 28 October 2022.

- The level of tree removal required to facilitate has been understated and is inaccurate and requires re-assessment to ensure a true representation of tree removal required to facilitate construction.

iii. Root Mapping Investigation.

- The root mapping investigations for T05 held within Section 2.6 of the report does not meet the minimum content requirements for such investigations as outlined within the City of Ryde Tree Management Technical Manual. In this regard, the following issues have been identified:

    - The as-excavated trench has not been completed along the alignment of the proposed works, failing to provide a reliable assessment of the likely impact to T05.
    - References to existing services having effectively acted as a contiguous root barrier cannot be verified due to the misalignment of the trench, insufficient photographic evidence, and the lack of a plan or section showing the as-excavated trench.

4. Biodiversity

With respect to the information provided in the Biodiversity Development Assessment Report (BDAR) the following items should be addressed:

- The BDAR does not include a checklist indicating compliance with BAM reporting requirements. This checklist should be provided, demonstrating compliance with BAM reporting.

- Further information is required to justify the explanation of how PCTs were determined, particularly PCT 1281.

- A single species credit has been assumed present without ample justification as to how this was determined. Further information is required to whether this species is likely to be present, and if so, what habitat features are likely to be lost from this proposal. The table provided for this species credit, Table 11, lists a PCT, which is not identified anywhere else within the BDAR as being present onsite.

- There is no information regarding placement of plots for planted native vegetation. In particular, the absence of native species within the plot data, which are known to occur within the Sydney Basin Bioregion, should be addressed.

- Discussion of the placement of Plot 1 for the remnant native vegetation is insufficient. The placement of the Plot within Figure 6 of the BDAR appears to be outside of the vegetation

zone.

- Further explanation on the PCT filtering process is required.

- Review of data input within the BAM-C to accurately portray the PCT selected should be undertaken and clarified in the BDAR.

- Review of foraging habitat suitability for Chalinolobus dwyeri should be undertaken and addressing in the BDAR.

5. Traffic and Parking

a. Parking Rates

The following points are noted concerning the nominated parking allocations

i. Student Accommodation

- The Applicant's EIS proposes zero parking spaces allocated to the proposed student accommodation. The proposed parking provision is unacceptable and amendments to the EIS should be provided to deliver parking rates consistent with the below recommendations.

- Whilst Council's parking strategy seeks to minimise the reliance of private vehicles as a principal form of transport, there is also a corresponding requirement that the development ensures it does not inappropriately rely upon on-street parking in the surrounding area. In this regard, the student accommodation component must ensure that it provides at least the minimum number of service and visitor parking spaces.

- The proposed student accommodation development will require, at a minimum, provision for shared vehicle parking and some allocation for private motor vehicle parking.

- The application of inner-city principles to this location is not supported. While Macquarie Park is a key strategic centre, the spatial distribution of infrastructure and services is significantly different from that of inner-city locations. Council recommends the Applicant reconsider their proposed parking rates outlined in Table 9 of the EIS. A parking strategy comprised of carshare vehicles and/ or alternative transport modes can be considered.

- For previous similar developments, the following parking rates were deemed warranted. The figures below are the level of parking noting the proposed accommodation of 730 students.
  - Residents - 1 parking space per 5 students
  - 1 bicycle + motorcycle space per 5 students
  - Visitors - 1 space per 20 students
  - Staff - As per the Commercial parking rate for the Macquarie Park area
  - Share Parking – a rate of 1 share space per 5 students

- The facility will also require a service dock / loading bay to address moving, loading, and unloading requirements of the student residents. The Applicant needs to provide details of proposed loading facilities.

- Deviations from these recommendations would need to be thoroughly justified. It is stressed that it would be inappropriate to make a direct correlation between an inner Sydney city location and the Macquarie Park area given there is an obvious difference with respect to the density and spatial arrangement of services, amenities, places of employment (particularly for students) and recreational areas.

ii. Retirement and Aged Care

- If the applications are made under the provisions of the SEPP (Housing) 2021 Part 5 (Housing for seniors and people with disability) then the parking rates in the SEPP should also be applied.

iii. School

- The documentation is inconsistent in regard to the type of school proposed; however, the applicant is to note that the DCP Part 9.3 (Parking Controls) contains a relevant control for schools and student parking demands. Any variations from this rate would need to be justified through traffic and parking studies.

- Concern is raised that the provided pick-up/drop-off area for the school site is poorly situated with limited sight distance to approaching traffic and an indented parking bay area that is inadequate for the student numbers presented. In alignment with Council's DCP, the pick-up/drop-off configuration to be provided should be located off the public domain and in the site itself.

iv. Residential

- For the proposed residential parking rates outlined in Table 9 of the EIS, the Applicant includes residential parking rates consistent with the RDCP 9.3. However, a parking rate for shared parking spaces has not been indicated. A shared parking rate should be included of:
  - 1 car share space per 50 spaces.

b. Trip Generation

- The peak hour trip generation adopted in JMT Consulting's traffic report appears to have been underestimated for the following reasons:
  - The traffic generated by staff, visitors and residents of the senior housing (residential care) component (comprising 256 beds) has not been included in the total trip generation assessment.
  - The proposed residential component comprises 565 private dwellings and 382 affordable housing units, which combine to provide a total of 947 dwellings. The peak hour traffic estimated for the proposed residential land use is based a total of 830 dwellings, which is less than the proposed development yield.
  - Based on a research report prepared by the University of New South Wales on boarding house developments in June 2019 (Titled: *Occupant Survey of Recent Boarding House Developments in Central and Southern Sydney*), it is noted that 1/3 of occupants in student accommodation developments were identified to own a car. In this regard, the trip generation rate of 0.1 trips per 100m^2 assumed in the traffic study is considered too low and potentially results in the likely traffic generated by the proposed development being underestimated.
  - The peak hour traffic estimated for the primary school component of the proposed development has not accounted for trips generated by staff.

- The traffic study should be updated to address the abovementioned issues to ensure an accurate assessment of the traffic generating potential of the subject proposal.

c. Traffic Modelling (SIDRA)

- The access road forming the western approach of the intersection of Herring Road and Ivanhoe Place is a private road under the care and control of Morling College. There are currently no plans at this point in time for this private road (referred to as Road 3 in Part 4.5 of City of Ryde DCP 2014) to be extended to connect with University Avenue in the near future (i.e. over the next 10 – 15 years). In this regard, the traffic modelling assessment should be updated to exclude the Herring Road access option.

- It is unclear whether the traffic modelling has considered the upgrade of Balaclava Road, which involves converting the one-way westbound section of Balaclava Road between University Avenue and Eucalyptus Street into a two-way road. This work is currently being delivered by Macquarie University and the modelling should be updated accordingly.

- The traffic modelling results contained in JMT Consulting's traffic report should be updated to consider the traffic implications associated with Transport for NSW's *Macquarie Park Precinct and Bus Interchange* project. For more details on this project, please refer to the link below:
  https://roads-waterways.transport.nsw.gov.au/projects/evolution-of-macquarie-park/macquarie-park-bus-interchange-upgrade.html

- The SIDRA modelling output in JMT Consulting's traffic report show the average vehicle queue. Transport for NSW's *Traffic Modelling Guidelines* requires the queuing analysis to be based on the 95% back of queue distance.

  Council requires electronic copies of the updated SIDRA modelling addressing the above points to allow review and further comment from Council's traffic engineers.

d. Road Network Improvements (Including Active Transport measures)

- The SIDRA modelling output in JMT Consulting's traffic report show a significant deterioration in the level of service (i.e. significant increase in average vehicle delay) at the intersection of Epping Road and Herring Road caused by the additional traffic generated by the proposed development. The applicant should consider appropriate mitigation measures to improve traffic efficiency at this intersection.

- The SIDRA modelling output in JMT Consulting's traffic report indicate that the average eastbound queue on Epping Road and the southbound queue on Balaclava Road during weekday peak hour periods extends past the existing access points off Epping Road and Balaclava Road. This will result in difficulties for drivers entering and exiting the development site during weekday peak periods. In this regard, the applicant should consider appropriate upgrades at the vehicular access locations to improve the safety and efficiency of traffic movements to and from the site.

- The Applicant is required to provide the following active transport infrastructure in accordance with City of Ryde's 2022 – 2030 Bicycle Strategy & Action Plan to improve cycling connectivity with key public transport nodes in Macquarie Park and reduce private vehicle travel:
  - Dedicated on-road cycle path separate to the live traffic along the eastern/southern side of Balaclava Road between Epping Road and the northern property boundary. The following Diagram (Figure 16) illustrates the preferred on-road cycle treatment in accordance with the Bicycle Strategy & Action Plan:

- Cycling crossing facilities across Epping Road at its intersection with Balaclava Road.

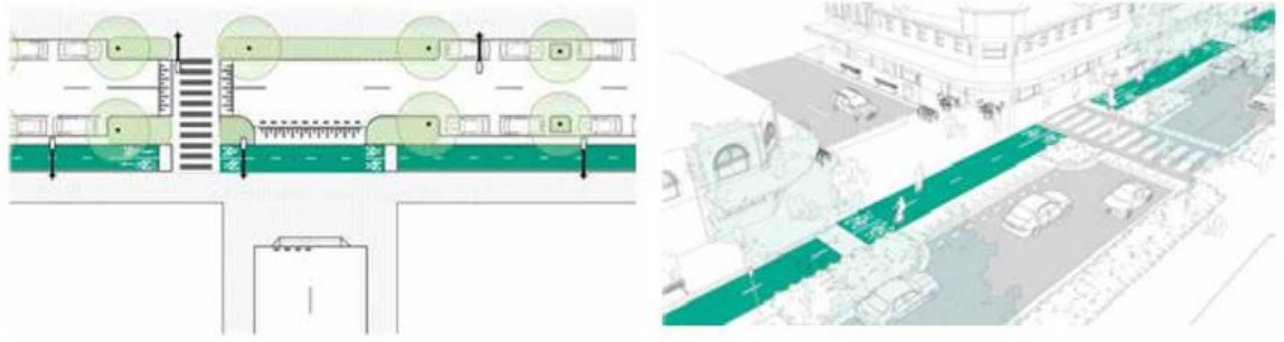


Figure 14: Diagram showing Intersection treatments for separated (on-road) one-way cycleways. (Source: City of Ryde's 2022 – 2030 Bicycle Strategy & Action Plan – Table 3)

6. Stormwater and Flooding

a. Stormwater Management

- It is considered warranted that the OSD strategy be divided over the site with storages and discharge controls accommodated in the footprint/scope of works of each tower block so as to ensure the maintenance of these components can be readily undertaken.

- Whilst the concept design comprising two large detention systems is compliant purely from the point of stormwater objectives in principle, in practice the future maintenance of these components would be problematic between the varying leaseholders and owners sensed to have interest in development on the site (i.e. the aged care, school, residential and retail components will be managed by separate owners or lease holders). The configuration will hinder the potential for the site to be subdivided in future, impacting the value of the land. Additionally, the configuration of private lots having to discharge over/ through public roads to central OSD systems will require private drainage easements over these services. Such an arrangement will not be supported.

- It appears that the western storage is located on land intended to be dedicated as public domain (future road), though as noted previously it is unclear whether this land will be public or remain private. All stormwater devices must be located clear of public domain land so as to prevent any imposition on the service of the area, to appropriately manage liability/risk, and to ensure there is no other imposition on other service providers.

- The OSD design strategy outlined in the Civil Report (Table 1) does not appear to correlate with the DCP requirements. The table itself needs to be clarified e.g. it is unclear what the values for "Target" and "Achieved" represent and how they were derived. The discharge from the post-developed site must not exceed the maximum flow from the 5yr ARI storm event from the unrestricted (no OSD) system. The design will also need to verify that the system does not exceed the current site so as to ensure the development does not exacerbate flood conditions downstream.

- The proposal seeks to pipe floodwater through the site and will replace the existing trunk line in the Masterplan works. The applicant is to note that the system will be part of the trunk drainage system and will, therefore, need to be designed to a public domain standard and require an easement to be registered over the line. All development above the future easement will need to observe Council's easement requirements and the placement of complex structures or retaining walls traversing the system will not be permitted. It is noted that the plans, whilst in a conceptual format, depict the stormwater outlet to the system over the Macquarie University site and will, therefore, need owner's consent in relation to these works.

- The stormwater plans must be consistent with the landscape plan so as to take into account TRZ and excavation limits.

b. Stormwater drainage

- A Stormwater Management Plan should be submitted and clearly demonstrate the proposed drainage for future subsequent development applications.

- The easement for the public stormwater network within the property must be created as per Council DCP and must be registered for future subsequent developments.

- The future developments must not encroach the proposed drainage easement.

- Existing Council drainage infrastructure details including, diameter, etc. should be shown on the relevant plans.

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

- Exact position of the Council drainage assets that are being connected to (including pit/pipe/headwall, etc.) shall be obtained by non-destructive methods.

- For any stormwater infrastructure in the public domain, a Stormwater Management Plan is to be submitted and must include the following information:
    - Design to be in accordance with Council DCP 2014, 8.2 stormwater management technical manual.
    - New pipe proposed if any in Council land and street, including the connection from the boundary pit to the proposed pit shall be STEEL REINFORCED CONCRETE PIPE, class 4, of minimum diameter >= 375mm.
    - Longitudinal Section to be provided and shall be cover compliant as per City of Ryde DCP 2014, 8.2 stormwater management technical manual, table 5.4. Please indicate the cover of the proposed pipe within Council land on the long section, and the type of RCP pipe (steel reinforced Class IV).
    - Minimum 1% slope to be provided for new drainage lines in Council land and street.

c. Flooding

- The flood impact assessment report prepared by Cardno (now Stantec) dated on 1 November 2022 shows that part of the property is affected with PMF flooding at Master Plan and Stage 1 works of Master Plan. Some of the critical infrastructure such as the education facility and

aged care retirement living lies in the PMF flood extent area. There might be evacuation difficulty for users of such facilities. It is recommended that critical infrastructure is repositioned away from the PMF flood extent area or provide evacuation plans/strategies for these sensitive uses.

- The flood impact assessment report must be prepared as per Council DCP 2014, 8.2 stormwater management technical manual for future subsequent development applications using 2D flood modelling software. The applicant must demonstrate that the proposed development will not adversely affect the flood conditions to the neighbouring properties or downstream catchment.

- The VD map for pre and post development must be included in the flood impact assessment report for future subsequent developments.

- Any basement and opening to a basement must be protected up to PMF flood level subjected to PMF flooding. Flood impact report must demonstrate that the basement will have immunity against all storms including PMF event.

7. Public Domain

a. Existing Public Domain Frontages

- The proposed development will impact adjoining TfNSW assets, and it is anticipated that TfNSW will impose a number of requirements and conditions in regards to the external works, which Council will need to review further in order to finalise their comments at a more advanced design stage.

b. Road Linking Herring and Balaclava Roads

- Council's Development Control Plan details future road connection between Herring Road and Balaclava Road, via Road No.3 running through adjoining site 122 Herring Road and extending along the northern boundary line of the subject site and Macquarie University.

- The DCP specifies the new road should be 20m wide, refer Figure 17. The Road 3 continuation should be designed to public road requirements and dedicated to Council within the final stage of works. The proposed Road 3 continuation will need to tie into the portion of Road 3 that will be built under LDA2019/264 for 122-126 Herring Road.

- A typical street layout for 20m wide streets is presented in Section 6.0 of the Public Domain Technical Manual and is to be implemented in the design.

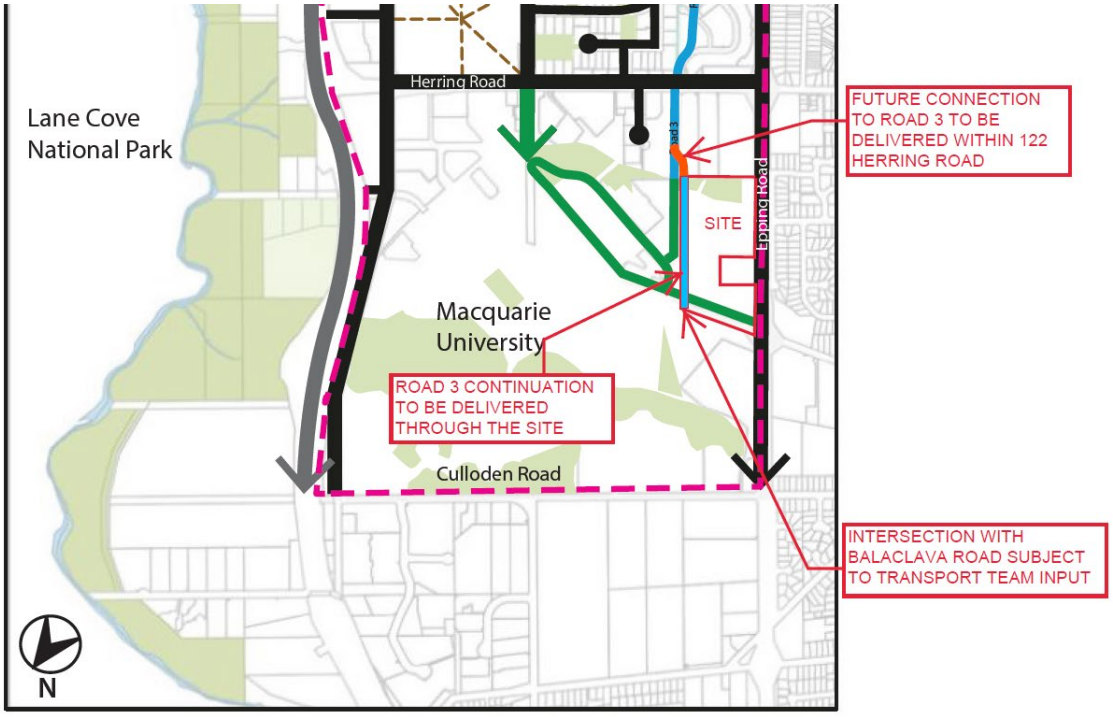


Figure 15: Road 3 Alignment Markup (Source: Ryde Council DCP)

- Plans submitted with the EIS and Civil Design Report (Appendix F) appear to have abandoned the alignment specified in the DCP and shown above. The plans indicate an alignment turning toward the central part of the site and extending toward Balaclava Road along the alignment of the current private road known as Eucalyptus Street as per Figure 18:

Figure 16: Proposed Road 3 Alignment (Source: Appendix F, Civil Design Report)

- At this stage there is a lack of clarity on which alignment will ultimately be constructed. The Applicant does not provide sufficient information and details confirming the completed Road 3 connection linking through the Morling College site.

c. Shared Path Upgrade Works

- As specified by Figure 3.2.1 of the Macquarie Park Technical Manual, the Epping Road frontage of the development is to be designated to be upgraded to 2.4m wide granite paving with nature strip. Granite paving works must be carried out in accordance with Council requirements. A reinforced blinding slab of 125mm thickness, overlaid by a sand and cement mix and paver thickness of 60mm must be provided. The crossfall grades of the granite footway must be 2.5% from the back of kerb to boundary line – internal entrances and vehicular access must accommodate this requirement.

- The documentation provided shows the intent to construct the deceleration lane along the Epping Road frontage to facilitate vehicular access as part of Stage 1. This lane will be dedicated to TfNSW as it will form part of the road carriageway. A compensatory 3.5m width piece of land will need to be dedicated to Council to enable it to maintain the existing verge width and provide for public amenity. The new boundary line should coordinate with the adjoining property – 159-161 Epping Road, which has also constructed a deceleration lane and dedicated compensatory land, 3.5m in width.

- Traffic modelling indicates there may be significant queuing on the Balaclava Road frontage of the site, impacting vehicular access. There may be a requirement to provide for an additional access lane in the vicinity of the site's vehicular entrance on Balaclava Road. An additional access lane may result in the requirement for further dedication of land to Council to enable the footway and on road cycleway to be constructed on the verge and clear of the vehicular carriageway. This additional access lane should be informed by further Traffic studies as requested by Council above.

d. Access Network – Cycleways

- Epping Road is identified as a Regional Bicycle Route in Figure 3.3.1 of the Macquarie Park Technical Manual. The Bicycle Network is to be implemented as an off-street shared cycleway along Epping Road.

- More detailed plans should be provided demonstrating how the cycle path along the eastern/southern side of Balaclava Road between Epping Road and the northern property boundary will be achieved, while maintaining the required pedestrian footway and vehicular carriageway, along with any potential access lane to service the Balaclava Road vehicular entry.

e. Staging of Works

- The services report found at Appendix F only provides a high-level overview of infrastructure for the Masterplan. This document should also include details of infrastructure roll-outs through the proposed stages of the superlots,

- The SEARs required an Infrastructure staging plan be provided. Page 25 of Appendix F includes an infrastructure plan; however it does not outline how infrastructure will be delivered in each stage. An infrastructure staging plan is required demonstrating the infrastructure delivery for each superlot and stage.

- Any infrastructure staging plan should include tree locations overlayed onto the plans.

- The EIS details four stages. The initial Stage 1 works are located such that there will be no direct interface with Council land, however, the staging plan suggests that accessways connecting to both Balaclava Road and Epping Road will be included within the initial stage (yellow colouring in Figure 19). Subsequent stages (2-4) are expected to be commenced up until as late as post 2029. As the subsequent stages works will be significantly delayed and the site will be well utilised following the 1st stage of the development works it is considered appropriate that some form of public domain works should be completed along the full frontages as part of the Stage 1 works to provide for improved access and facilities for the public. Delaying public domain works along the Epping Road and Balaclava Road frontages until such time as the later stage works are completed will result in limited access infrastructure being in place for the next decade, resulting in poor operation of the site.

Figure 1 Proposed indicative staging plan

Source: BVN

Figure 17: Proposed Staging Plan (Source: Appendix E, page 64)

f. Vehicular and Pedestrian Access for Each Stage

- Access to all parts of the site must be verified throughout all phases of the development. It is understood that it may not be possible to accurately forecast traffic/pedestrian movements for later stages, however it is important that the masterplan make consideration for potential volumes and arrangements.

- This should include road alignments, intersection treatments, and coordination with pedestrian access and other forms of transport infrastructure e.g. Cycleways, bus stops etc.

g. Expected Queuing and Vehicular Access Upgrades / Deceleration Lanes

- There is a likelihood that queuing will be a significant issue obstructing or slowing access to the site in peak weekdays periods on both the Epping Road and Balaclava Road frontages. TfNSW imposed a requirement to provide an additional declaration lane on the Epping Road frontage to provide safe access to the adjoining development at 159-161 Epping Road, Macquarie Park. It is anticipated that the same treatment will be required for the development's Epping Road vehicular access point. As the deceleration lane would be on existing Council land, it is expected an additional lane width (3.5m) will be dedicated to Council to enable the existing verge width to be maintained.

h. Summary of Additional Public Domain Information Required

- To demonstrate adequate ongoing arrangements throughout multiple stages of the development site a comprehensive public domain access management plan should be provided detailing the following:
  - Vehicular access to all operational buildings during each stage and interim period of the full development life. This should include access from public areas outside the site and also ongoing access through the site.
  - Pedestrian access.
  - Intersection treatments – e.g. Roundabout requirements.

- An infrastructure staging plan, outlining the proposed infrastructure roll outs for each stage, which includes tree overlays, is required.

- A public domain access management plan in a sequential manner, demonstrating management of pedestrian and vehicular movements and linkages to other forms of transport in each different interim phase should be provided.

- Clarity on the proposed option for connecting Herring Road with Balaclava Road is required. This should be informed via further Traffic Study as per requirements from Council above.

- Clarity on areas proposed to be dedicated to Council as future road reserve are required. This should include strips of land adjacent to deceleration lanes, required to maintain the existing verge width and facilitate public domain upgrade works such shared user path and multi-Function pole installations.

- Details of any additional requirements for additional access lanes on Balaclava Road (e.g. additional land dedication), to enable adequate access in the case of excessive queuing is required. This requirement should be informed via additional traffic studies as required by Council above. As an on-road separated cycle path is required along the Balaclava Road frontage of the site, provide details showing how the required pedestrian footway, potential access lane and on-road cycle path can be delivered without impacting the carriageway. In the case that any additional dedication is required details should be provided.

8. Waste Management

a. General

- Any domestic rated property is to be serviced by the City of Ryde's waste service. As such Council requires clarification as to which of the Lots will be known as a Business, Non-Rateable Property, or which will be sold to individuals and thus be domestic rated.

- Appropriate provision of space for bins and bulky waste rooms and other associated services must be provided. Generally, bulky waste rooms will require at least 5m2 per 30 units.

b. Loading Bay/zones

- To assess whether there is safe ingress and egress into the development to collect bins and bulky waste material the architectural plans must provide details of the location of loading zones, bin rooms, bulky waste rooms and associated swept paths for an HRV truck of a minimum of 11.80 metres in length and 4.5 metres in height. A loading dock management plan must also consider the ingress and egress of Waste collection vehicles.

9. Strategic Planning

From a strategic planning and land use perspective, Council provides the following comments on the EIS:

- In review of Appendix G Community Engagement Report during the consultation of the EIS and preparation of the SEARs, no response from the Department of Education and Training (DET) has been provided or consultation undertaken. Council requests that the application be referred to DET for comment and the Applicant undertake engagement with DET to understand the requirement for delivering a school within the Masterplan. The current application does not provide detail demonstrating the specific need for a school and does not demonstrate how the current location is suitable.

- To ensure any future school is appropriately designed to address future need, identifying and articulating the need for a new school on site is considered to be a "Key issue" necessary for assessment in the EIS. An analysis of the need for a school should be undertaken before a concept approval is granted. Appendix Q Social and Economic Impact Assessment does not sufficiently articulate the need proposed to be addressed by the school. Council is concerned that inadequate consultation with DET may have been undertaken in formulating the SEARs and considers that insufficient assessment by the Applicant has been undertaken in relation to the need for a proposed future school.

- In the Strategic Planning Context section of the EIS, it is stated that by delivering a school, the development will support the NSW State's Priority of 'highest quality education'. It is also states that the proposal for a school is consistent with the City of Ryde Community Strategic Plan 2028 by acknowledging the demand for education will be greater in the City of Ryde with the number of children and teenagers in the LGA projected to increase by more than 40%. This is not considered an adequate assessment and as discussed above, a more detailed analysis of future need (including detailed demographics as they relate to need

across specific school years), should be undertaken. It should also consider existing and future schools planned in this catchment.

- Targets 2.2.4 and 3.1.4 of Planning Ryde: Local Strategic Planning Statement 2020 (LSPS) state that 'Local schools will meet the demand of population growth and changing demographics'. The LSPS is required to be addressed in the EIS as per the SEARs (Key issues - 1. Statutory and Strategic Context). An analysis of the future need for a school would also address these targets as required by the SEARs. Other relevant planning priorities and actions of the LSPS also need to be addressed in the EIS (see comments below for sections of LSPS not addressed).

- The EIS states that the operating model of the school is yet to be determined and development approval for the school will be sought separately following concept approval. Some operational aspects of a future school need to be assessed before a concept approval for a school can be granted in that location, such as (but not limited to) potential provision for pick up and drop off areas, pedestrian access points, and open space. This is due to the potential operational impacts of the school to surrounding land uses and other proposed developments on site.

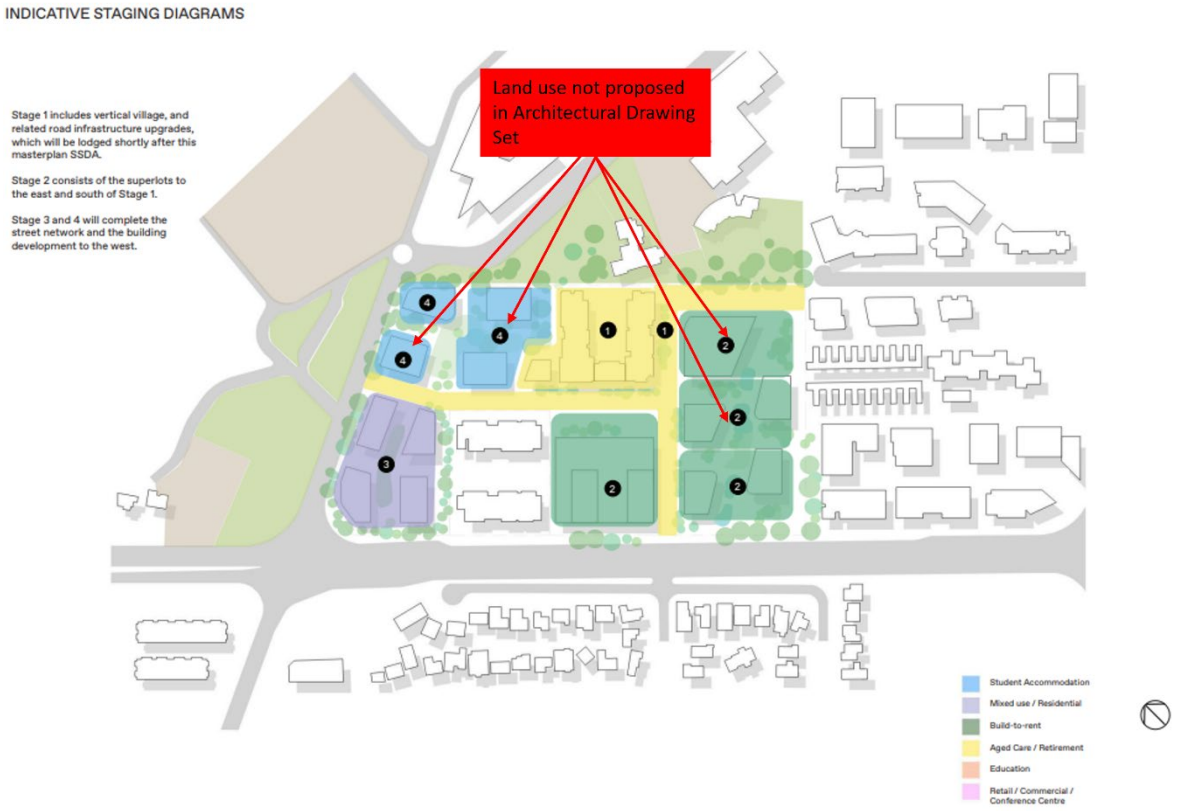
- The site has access to good transport infrastructure, including buses and Metro stations, and bicycle networks which connect the site to Epping Road, Macquarie University and retail and services within Macquarie Park. As such, providing seniors housing on the site would assist in ensuring that more seniors housing is provided and developed in a more suitable location. This is also partially consistent with Council's LSPS in that it will provide housing supply to satisfy existing and future need for more seniors housing within town centres (LSPS Planning Priority H1, Action H1.2, Planning Priority H2 and Action H2.2) and will assist in protecting the character of low-density residential areas in being developed in response to a need for seniors housing (LSPS Planning Priority H3 and Action H3.3). However, while there is demonstrable need for seniors housing, it is crucial that there is sufficient amenity on site and permeability and access to supporting services in the vicinity. This is particularly significant given the high density proposed. The EIS should explicitly address the other relevant Actions, including H5.1, H5.2, C4.1, C4.7, C6.1, D4.4, OS2.1, OS2.4, OS3.1, OS3.2, OS4.1, OS4.2, OS5.3, E1.1, E2.3. As indicated above, Council is concerned that the quality of open space and through site links require improvement and the proposed built form and building envelopes require further consideration to ensure the proposed future residents are afforded an appropriate level of amenity.

10. Inconsistency of documentation submitted

In review of the EIS and submitted documents in the Appendix, there are a number of instances of conflicting information outlining different land uses proposed in different locations, as such Council recommends that the Applicant examine their submitted package in detail and amend the supporting documentation to correctly and consistently articulate the proposal to ensure future Applications are consistent with concept approval (if approved). The following examples are noted (but are not an exhaustive list):

- The Architectural Drawing set shows the site split into different stages with associated land uses. In review of the Architectural Urban Design Report (Appendix E, refer page 64), it

shows different land uses proposed in stage 2 and stage 4 (Figure 20), when compared to



the submitted Architectural Drawing Set (Figure 21).

Figure 18: Markup of Proposed Staging Plan (Base Source: Appendix E Architectural Urban Design Report, Page 64)

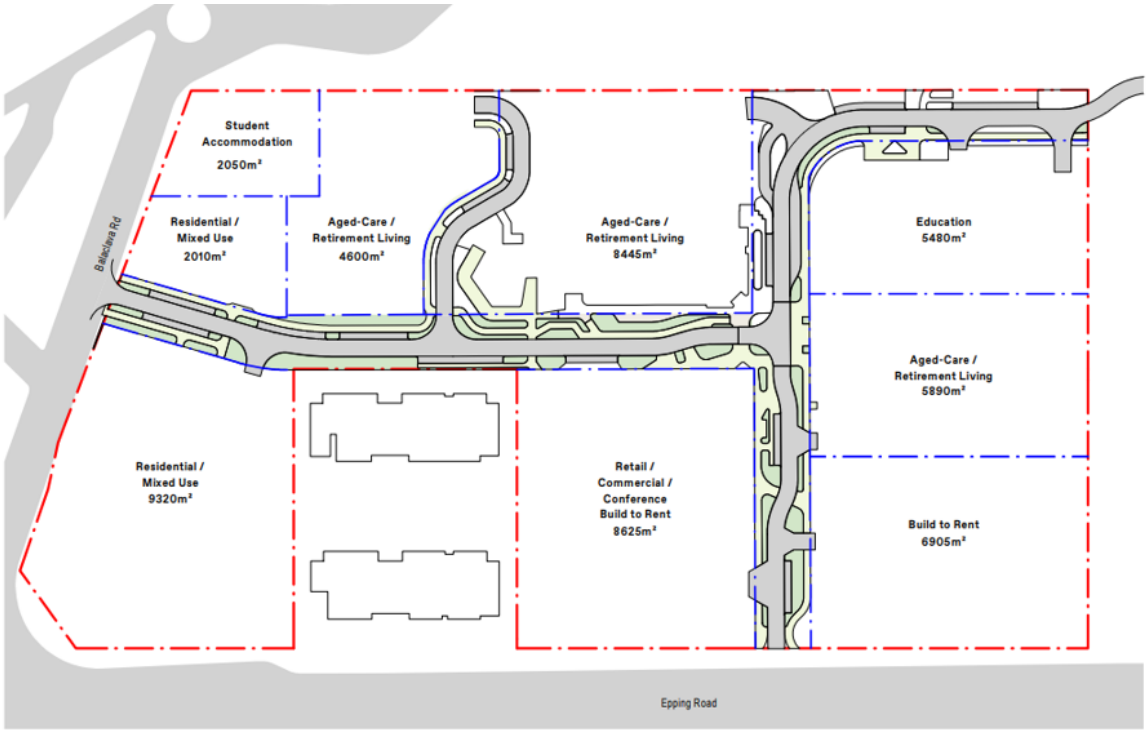


Figure 19: Proposed Land uses (Source: Architectural Drawing Set, Page 1)

- Appendix E (Architectural Urban Design Report) also shows that retail space (shown in pink) is in the location of the Eastern Park as proposed under Appendix N Landscape Design Report (Figure 22).

All documentation should be reviewed and amended where required to reflect the Applicant's intended land uses accurately and consistently.

Figure 20: Markup of proposed neighbourhoods and land uses (Base Source: Appendix E, Architectural Urban Design Report, Page 40)

11. Land Dedication and Contributions

- As raised in Council's submission on the SEARs request and outlined in the above document, there are a number of items in the proposal that the Applicant could dedicate to Council or intend to keep private, however insufficient detail is provided with this Application to determine the Applicant's intent.

- Council would be unwilling to accept the roads and open space in their currently proposed form and amendment is required.

- Council recommends the Applicant engage with Council regarding any potential dedications and the appropriate mechanism for this to occur, such as a Planning Agreement.

12. Additional Information Requested

- Council requests that the above issues outlined be addressed during the Response to Submission phase of the Assessment. This information is requested to be provided to Council for further review and comment.

- Should the Applicant wish to engage with Council directly on the issues raised above, Council

would welcome the opportunity to consult with the Applicant.

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 diverse housing and education uses, 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.