

ATTACHMENT 1

City of Ryde Submission

North Ryde Station Precinct – Modification 6 SSD-5093-Mod-6

Modification of North Ryde Station Precinct SSD-5093 - Increase GFA, modify building layout, open space, roads.

Submission Date: 26 September 2023

EXECUTIVE SUMMARY

Introduction

Thank you for inviting City of Ryde to comment on the proposed Modification for the Concept State Significant Development (SSD) Application for the North Ryde Station Precinct Macquarie Park SSD-5093-Mod-6. The Modification Application seeks approval for modifications to the approved concept SSD application (SSD-5093). The proposed modifications sought to SSD-5093 include:

The Applicant is seeking to Modify the Approved Concept Application, to increase maximum GFA to certain lots and Torrens Tile subdivide the land proposed for a public park being dedicated to Council. Specifically, it involves:

- Increase the maximum GFA across Lot 102, 110, 118 and 119 (the sites) collectively from 82,212sqm to 97,950sqm (representing an increase of 15,738 sqm). The GFA amendments are demonstrated in Figure 1:

The proposed change in maximum GFA is summarised as follows:

Table 1 Development Data Summary				
	SSD 5093 Approval Site Area (m ²)	SSD 5093 Approval Max. GFA (m ²)	Proposed Max GFA (m ²)	Net change (+/- m ²)
Lot 102 (formerly Lot 201)	6,275	42,949	42,949	0
Lot 110 (formerly Lot 202)	6,395	25,626	37,153	+11,527
Lot 118 (formerly Lot 207)	2,656	6,883	11,569	+4,686
Lot 119 (formerly Lot 208)	3,135	6,754	6,280	-474
Totals	18,461	82,212	97,951	15,739

Figure 1: Proposed GFA Summary (Source: Modification Report Planning Ingenuity)

- Amend the built form to respond to the site and its context, specifically:
 - Apply the built form design guidelines as identified in the Urban Design Report by FJC Studio to all future development applications for Lots 102, 110, 118 and 119
- Subdivide Lot 119 to introduce a new 1,200sqm public park to be dedicated to City of Ryde Council as public open space as part of a Voluntary Planning Agreement.
- Commit 5% of the proposed GFA uplift to affordable housing
- Deliver a Green Travel Plan for Work-related and non-work-related movement for future site occupants including minimum standards for end-of-trip facilities with new development applications.

Key Issue Summary

In review of the Modification Report and supporting documentation several issues have been identified. Details of these issues are detailed in the body of this attachment. The key issues identified with the Concept SSD Application include:

Affordable Housing

- The proposed quantum of affordable housing represents 0.82% of the sites proposed maximum GFA. This is inconsistent with the City of Ryde Affordable Housing Policy 2016 – 2031.
- Given the significant amount of GFA increase and lack of public benefit associated with that increase, any GFA increase should be consistent with Chapter 2 Affordable Housing of the State Environmental Planning Policy Housing 2021.

Open Space and Land Dedication

- The Applicant's proposed VPA for a 1200m² public park does not meet the public open space provision requirements as detailed within Council's LSPS. Even if a larger park is proposed by the Applicant, due to the location and configuration of this space it significantly limits its functional value to the wider community and any associated public benefit.
- Council is not in a position to accept the proposed park for public use in its current format.
- Council is currently considering alternatives to the park and have engaged with the Applicant.

Impact on the Macquarie Park Place Strategy

- The scheme lacks consideration of the Macquarie Park Place Strategy and the future precinct that it will interface.
- Further information is needed to demonstrate the scheme appropriately manages impacts on the Garungul Precinct and associated open space.
- Providing future opportunities for achieving a fine grain pedestrian network between buildings connecting Halifax Street to Wicks Road.

Urban Design and Masterplan

- The Applicants approach of applying their prepared design guidelines to the sites is not supported as Council has prepared their own Urban Design Guidelines to the entire residential Precinct.
- The Applicant should prepare an amendment to Council's Urban Design Guidelines for High-Density Residential Precinct & Lot 107 Lachlan's Line" (LLUDGL) with final approval of the design outcome by Council.
- Ensuring protection of the view corridor down Halifax Street looking north by setting buildings back on lots to the northern end of the site.
- Identification of active frontages and ground level interface of buildings along streets should be included in the submission that is in accordance with the urban design guidelines.

Each of the issues/conditions are detailed below:

1. Affordable Housing

Council notes the importance of delivering affordable housing and stresses the importance of delivering more affordable housing to address the cost-of-living crisis. Concern is raised with the Applicants suggested rate of GFA proposed for affordable housing use. It's noted the application seeks too:

3.2.9 Mechanisms for Delivering Affordable Housing

Affordable housing will be delivered as 5% of the increase in maximum GFA. This equates to 576.35m² of affordable housing within Lot 110 and 234.3m² of affordable housing within Lot 118.

The Application proposes to dedicate **only 5% of the bonus GFA sought** as affordable housing. This approach is not supported by Council as it is inconsistent with Council's *Affordable Housing Policy 2016 – 2031*. Council's Policy requires 5% of all **new dwellings** be delivered as affordable housing. This would mean that **5% of the total GFA for the sites** (including any additional) would be required to be delivered as affordable housing. Applying the 5% affordable housing rate to all to the sites GFA, including what is already approved under SSD-5093 would calculate as outlined in Table 1:

Lot Number	Site Area	Proposed GFA	Affordable Housing Rate at 5% of GFA
Lot 102 (formerly Lot 201)	6,275m ²	42,949m ²	2147.45
Lot 110 (formerly Lot 202)	6395m ²	37,153m ²	1847.65
Lot 118 (formerly Lot 207)	2656m ²	11,569m ²	578.45
Lot 119 (formerly Lot 208)	3135m ²	6,280m ²	314
Total (for site Mod 6 applies)	18461m ²	97,951m ²	4,887.55m ²

Table 1: Affordable Housing Calculation Table

The Applicants suggested GFA of 810.65m² being delivered as affordable housing results in a shortfall of 4076.9m² GFA used for affordable housing that is required by Council's Affordable Housing Policy and the Lachlan's Line Urban Design Guidelines.

The Applicant is seeking significant FSR uplift which value adds to the development significantly, whilst provides tokenistic affordable housing contribution which does not provide sufficient contribution to Council's Affordable housing target. The Applicants affordable housing contribution represents less than 1% of the site (subject of Mod-6) total GFA, this is shown as:

- Total GFA of 97,951m² percent of 810.65m² (proposed affordable housing) = 0.82%

It's noted that the Applicant provides rationale to support their claim that their affordable housing contribution is sufficient, being that MOD-5 of SSD-5093 recently approved a significant uplift in GFA to lot 117 that's subject to it being used for 100% affordable housing purposes. This rationale is however not supported for the following reasons:

- Lot 117 has a specific condition imposed that reverts its GFA to the original under SSD-5093 if not used for 100% affordable housing or GFA calculated in accordance with any relevant Environmental Planning Instrument (EPI). As such if the Applicant (of Lot 117) does not deliver the 100% affordable housing development, it will revert to the base GFA for the site. Reliance on this site to deliver affordable housing for the entire precinct is not appropriate as each site should deliver affordable housing
- Lot 117 is owned by Landcom, whilst the sites subject of MOD-6 are a different landowner. Notwithstanding all applicable land within the Lachlan's line Precinct would be subject to 5% affordable housing, therefore reliance on another site to deliver the subject sites affordable housing is inappropriate.
- Lot 117 or any other lot within the Lachlan's Line Precinct contribution to affordable housing does not exclude/diminish any other lots required affordable housing contribution.

Relevant to Affordable Housing is Council's Urban Design Guidelines (*Urban Design Guidelines for High-Density Residential Precinct & Lot 107 Lachlan's Line*) prepared for the High-density precinct in Lachlan's line. This document outlines that all proposals within the high-density precinct are to deliver affordable housing consistent with Council's affordable housing policy, which in the case of MOD-6, does not.

The Applicant's planning report has stated that if the *Chapter 2 Affordable Housing of the State Environmental Planning Policy Housing 2021* did apply, the maximum bonus FSR that would be required to be used for affordable housing is 2% of the maximum permissible floor space ratio. However this control is only applicable if at least 20% of the gross floor area of the building resulting from the development will be used for the purposes of affordable housing. This is not the case with this proposal as only 5% of the additional floor space is proposed as affordable housing.

The Applicant's planning report has indicated that the affordable housing will be managed by a community housing provider and those units to be affordable housing will be identified in subsequent development applications. The SEE fails to give any detail as to whether these apartments will be held in perpetuity as affordable housing. Unless these apartments are affordable housing in perpetuity, Council raises significant concern about the public benefit associated with the development. The proposal is already delivering a fraction of the amount of GFA as affordable housing as what would be expected by Council's policies, and if these apartments are to revert to residential apartments after a limited time period, this is not considered to be an adequate public benefit.

The SEE also proposes that the Applicant will nominate the apartments to be affordable housing with subsequent DA's. This is likely to result in the apartments with the least amount of internal amenity being allocated as affordable. Council is of the view that the apartments should be able to be nominated by Council and these apartments should be dedicated to Council. At the very least, apartment to be identified as affordable housing should include a parking space, receive 2 hours of solar access to the living rooms and private open space between 9am and 3pm mid winter and be naturally ventilated.

Council does not support the Applicants approach for affordable housing as the above demonstrates it is entirely inconsistent with Council's 5% policy. MOD-6 proposes less than 1% GFA being used for affordable housing, whilst seeking a significant value add.

2. Open Space and Land Dedication

The Application intends to enter into a Voluntary Planning Agreement (VPA) with Council to deliver a 1200m² park. Council has not received a formal letter of offer seeking to enter into a VPA with the Applicant nor has Council been adequately consulted on any VPA. It's noted the Department of Planning and Environment's (DPE) request for information letter dated 7 August 2023 outlined the applicant was to consult with Council on this matter. While the Applicant has consulted with Council, these discussions are ongoing in respect to a VPA.

Notwithstanding, Council has reviewed the application and the proposed park which is intended to form park of the Applicant's VPA with Council. The proposed park does not meet Council's identified Open Space requirements or provide any meaningful public benefit and is not something Council would consider accepting for the following reasons.

- The proposed 1,200m² open space does not achieve Council's LSPS minimum park area of 1,500m² in a high-density location with a preferred size of 3000m².
- The proposed 1,200m² open space does not align to the NSW Government Architects [Draft Greener Places Design Guide](#). Issues include scale, edge to area ratio and proportions.

- The proposed 1,200m² does not align to Council's Integrated Open Space Strategy design requirements for public open space.
- The Desktop Flood Review (28/7/2023 – prepared by SGC) demonstrates that the proposed public open space is located within the 1% ARI flood area. This is unacceptable for public open space proposed to be dedicated to Council due to potential damage to infrastructure.
- The size, location and configuration of this space significantly limits its functional value to the wider community.
- It is not a matter of the Applicant simply increasing the size of the park as this is unlikely to satisfy the other dot points identified above.

The Applicant's offer does not provide a consolidated open space that provides use to the wider community and in its current form, Council is not willing to accept ownership of the park which the Applicant is seeking to dedicate. Council notes that in its past dialog (refer letter dated 5 August 2022 – Attachment 4 of MOD-6) with the Applicant that a recommendation was provided suggesting that the park could be better positioned at the Northern End of Lot 102 as this positioning enabled greater solar access, improved integration with linear park and improved visibility from the street. There is no discussion or dialog as to why this option has not been explored by the Applicant. If the park is to be considered by Council, then it must be planned and designed to Council's satisfaction, with final design to Council's Approval.

The Strategic Infrastructure and Services Assessment (SISA) for the Macquarie Park Corridor has identified that the precinct has a serious deficiency in open space, both for passive and active recreation.. The Applicant has not demonstrated how increasing the density of these sites will address this deficiency. Nor has the Applicant considered the likely timing of when additional open space will become available. The required infrastructure should be provided before any increase in the floor space is considered.

Council wishes to consider alternatives to the proposed dedication such as funding of other open space infrastructure works within the Macquarie Park area and wishes to continue to engage with the Applicant to find a more appropriate solution.

Any approval of this application should not be considered unless the Applicant and Council has entered into a VPA. This is critical to the proposed application given that additional floor space is proposed without providing any additional infrastructure to support the increase and the applicant proposal for affordable housing provides minimal public benefit.

3. Impact on the Macquarie Park Place Strategy

Council raises concerns with the modifications GFA increase and its impact onto the adjoining land, mapped under *Macquarie Park Innovation Precinct Place Strategy* and *Macquarie Park Innovation Precinct Master Plan*. Particularly Council raises the following issues:

- There is a lack of information of the integration of the proposed massing with the *Macquarie Park Place Strategy* (MPPS). This information is required for elements such as the building setbacks, shadowing, massing and more. It's noted that the western boundaries of the sites interfacing the Garungul (unbreakable) Wicks Road South Precinct are burdened by a 2.4m easement. Consideration should be given to this upon any amendments of the design. Further information is required on the Urban design interface of the Garungul Precinct.
- The Place Strategy provides the superblock structure for the precinct with the expectation that further fine grain pedestrian connections would be achieved on individual sites. This would be expected to be achieved between buildings, as an extension of the mews road in

order to provide opportunities to connect Halifax Street to Wicks Road as sites along Wicks Road develop in the future. Further information is required on how this would be delivered.

- Proposal will need to consider solar access implications to the linear park along Halifax Street and the proposed open space within the Wicks Rd South/Garungul precinct in the MPPS. Whilst possibly a mistake, it appears in review of FJC Studio's Urban Design Report (Solar Studies), shadow studies from between 9am to 12am on the 21st of June are omitted from the package. Notwithstanding, the land west of the subject site is noted to be public open space under the MPPS, specifically being identified as the "Corridor Square" (Figure 2).

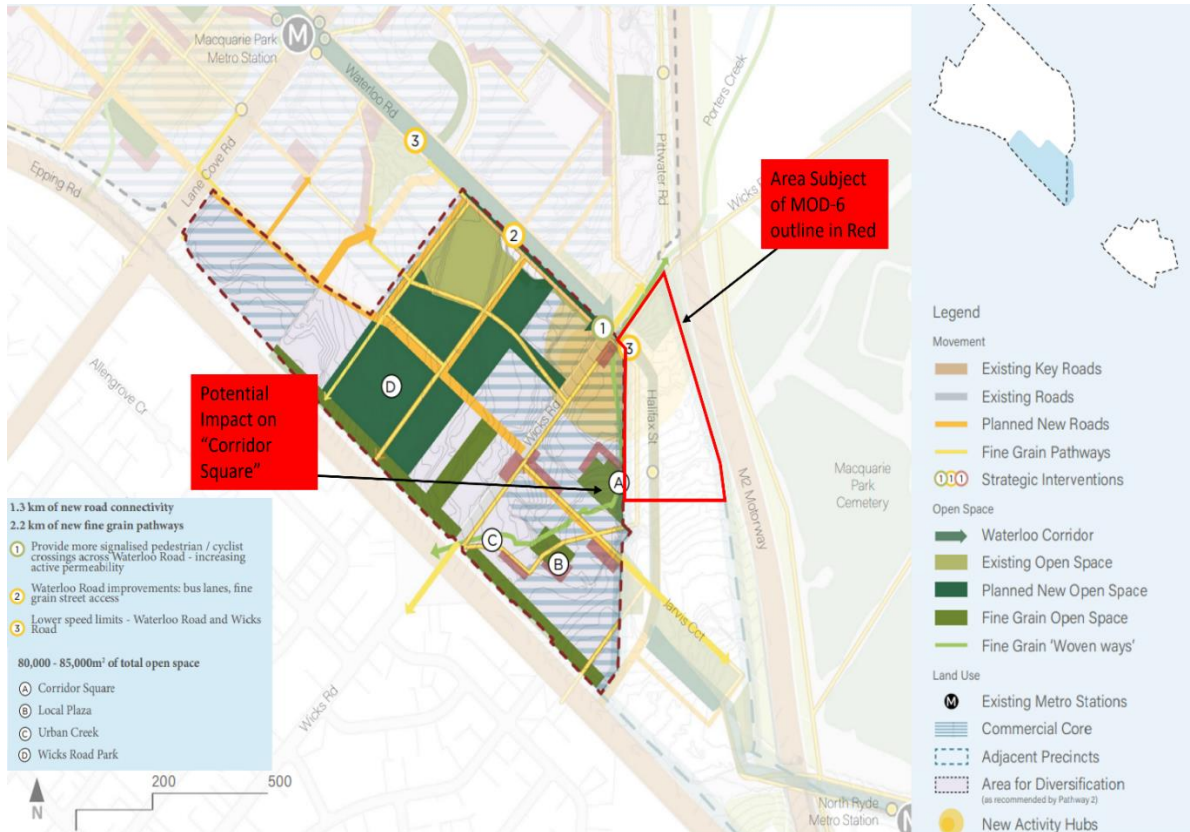


Figure 2: Markup of Garungul (unbreakable) Wicks Road South Precinct Structure Plan (Base Source: Macquarie Park Strategic Masterplan – page 135)

- As shown in Figure 2, land adjacent is marked as being developed into a green corridor square used for public open space purposes, whilst MOD-6 is proposing a GFA uplift to the buildings on the western side of the precinct to enable built forms of up-to 13 stories, which is double what was envisaged under SSD-5093 (Figure 3). This mass and height uplift not envisaged under SSD-5093 causes concern from an overshadowing and visual impact point of view.
- The schemes information lacks clarity on the consideration of the future character of the Macquarie Park Precinct (Garungul) that it will be interfacing (Figure 2), and the associated impacts on this space. Whilst it's noted to be of an industrial character (existing), the character of the area will change, consistent with the structure plan. Given this, further information is required on the following:
 - Detailed Solar Studies (from 9am Winter Solstice) showing the expected impact on Corridor Square. The Applicant is to note the design criteria of this Precinct, particularly noting that in respect of overshadowing the design criteria requires:
 - Open spaces are to have solar protection between 10am-2pm on the winter solstice.

- Further visual analysis and assessment of the schemes bulk and scale interfacing Corridor Square, fine grain active frontage and the Garungul Precinct and how it will interact with the future locality of the Garungul Precinct.



Figure 3: Markup Comparing Massing under SSD-5093 to MOD-6-SSD-5093 (Base Source: FJC Studio (Left) and Batessmart (Right))

4. Urban Design and Masterplan

i. Urban Design

The scheme is proposing a significant mass increase to the approved masterplan, which will impact the design deliverable of future development applications. It's further noted that the scheme is seeking to apply FJC Studio's Urban Design Report as a built form guidelines to Lots 102, 110, 118 and 119. Due to the significant mass increase and Applicant seeking to apply their own design guidelines to only half of the North Ryde Station Precinct, Council requests that this be referred to the State Design Review Panel for review.

Notwithstanding the above, the Applicant's approach of only applying their guidelines to half of the entire residential precinct (Figure 4), is inappropriate and does not deliver a cohesive vision for the precinct and could result in a vastly different urban design outcome as two different urban design guidelines would apply to either end of the precinct (if approved). The Applicant's approach is not supported by Council, particularly as Council has a prepared detailed design guideline that applies to the **entire** Residential Precinct under SSD-5093 known as the "*Urban Design Guidelines for High-Density Residential Precinct & Lot 107 Lachlan's Line*" (LLUDGL). These Guidelines will be attached under separate cover (**Attachment 2**).

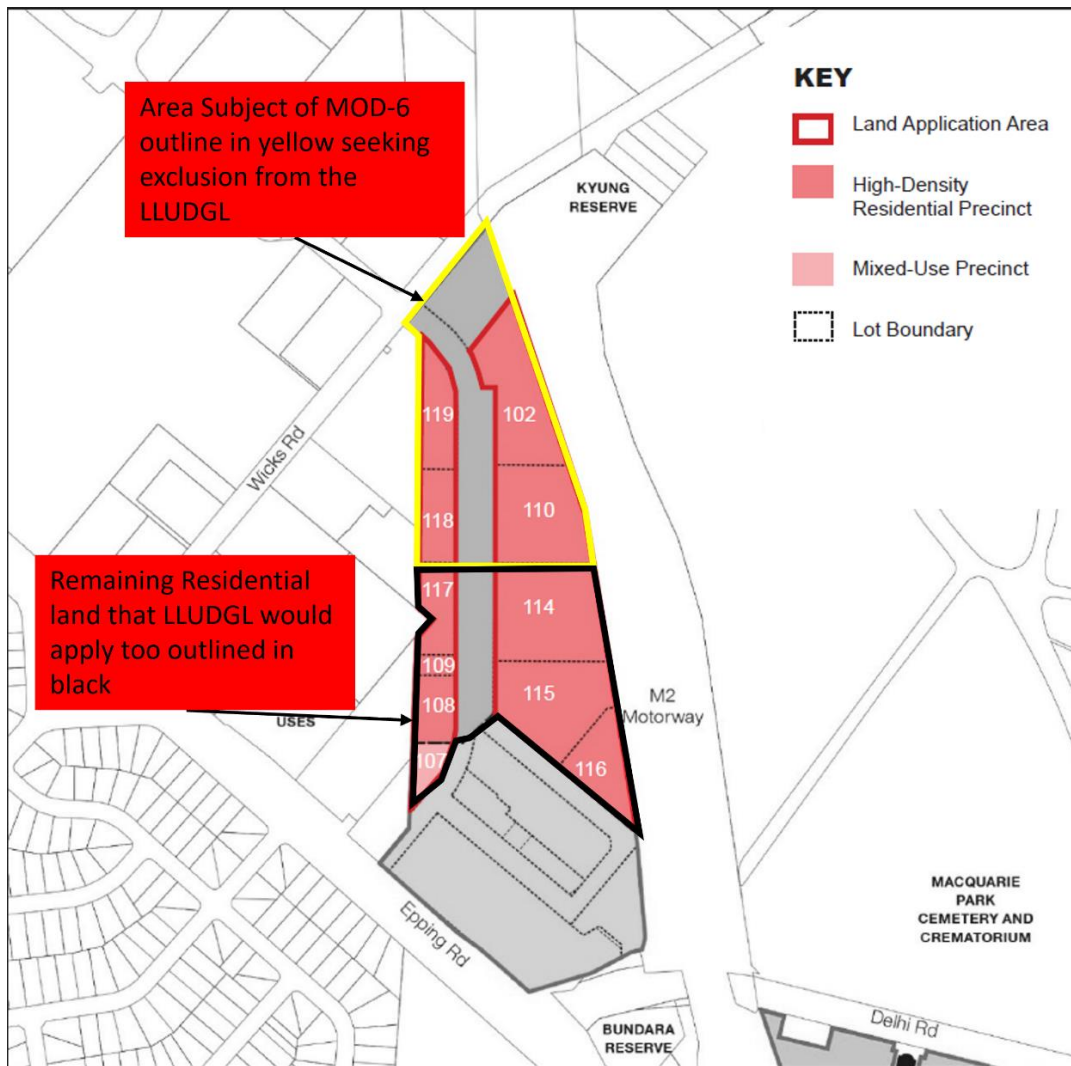


Figure 01. Land application map

Figure 4: Mark up of Land Application Map (Base Source: LLUDGL – City of Ryde Council)

Council notes that the SEARs issued to the Applicant (dated 30 June 2023) contemplated the proposed modifications implications on site specific provisions that may apply to the precinct, as outlined in Item 2 of the SEARs. Item two states:

2. Consistency with the Concept Approval

- describe how the existing Concept Approval (SSD 5093) will be amended by the proposed development
- address any changes to the land use mix and associated floor space and justify the proposed amendments
- illustrate the amendments sought to the existing Concept Approval, including comparative analysis on building envelopes, floor spaces, uses and any relevant conditions of consent
- include a staging and delivery plan for the delivery of public domain, car parking and other common facilities and any public benefits such as social and affordable housing
- **address the relevant site-specific provisions for the site in the North Ryde Station Precinct Development Control Plan 2013 and any proposed amendments. (Emphasis Added)**

The SEARs request outlined that the Proponent was to propose amendments to the *North Ryde Station Precinct Development Control Plan 2013* (NRSP -DCP), however this DCP is an outdated planning instrument that does not relate to SSD-5093. The NRSP-DCP came into force on 4 December 2013, Whilst SSD-5093 was approved by the Minister of Planning on the 5 of March 2015.

In response to SSD-5093 Council prepared a detailed site specific guideline (dated 12 July 2019) as outlined above that applies to SSD-5093 and contains fine grain planning outcomes related to development applications. The LLUDGL supersedes NRSP-DCP and contains controls that were within the NRSP-DCP however more relevant to SSD-5093. Whilst the LLUDGL has not formally been adopted by Council, it is accepted that it's the applicable planning instrument that a detailed DA for high-rise residential development within Lachlan's Line would be assessed against, which Council has recently applied to LDA2022/0390 (5 Halifax Street).

The Applicants Planning Report and Urban Design package has undertaken a detailed assessment of an outdated planning instrument that wouldn't ordinarily be applied to at a detailed DA and then further seeks to implement their own design guidelines to a portion of the precinct. The Applicant has undertaken no assessment of the scheme's consistency with the LLUDGL, or how it deviates, although are aware that its applicable.

Rather than seek to exclude applicability of the LLUDGL from the Applicant's land, Council would request that the Applicant, in-conjunction with Council, propose amendments to the LLUDGL, with final approval from Council and then have them formally apply to SSD-5093, via an amendment to condition E2.

It's noted that MOD-5 contemplated amendments to Condition E2 in the consolidated consent issued, however this amendment did not translate into the final modified consent issued by DPE. Should the department consider Council's position, the following amendments is proposed to Condition E2.

~~NORTH RYDE STATION PRECINCT DCP~~ *Lachlan's Line Urban Design Guidelines*
E2 Future Development Applications shall demonstrate that the development has been designed in accordance with the requirements of North Ryde Station Precinct Development Control Plan (NRSP DCP) and the City of Ryde Urban Design Guidelines for High-Density Residential Precinct & Lot 107 Lachlan's Line (LLUDGL) and achieves the vision for North Ryde Station Precinct as set out in the NRSP DCP LLUDGL.

In order to provide a quality outlook for buildings and the public domain it is important that a view corridor is achieved looking north along Halifax Street. This will require setting buildings back on the northern lot. A density transfer may be negotiated with Council to achieve this view corridor given it is not identified in the Urban Design Guidelines.

Identification of active frontages and ground level interface of buildings along streets should be included in the submission that is in accordance with the urban design guidelines.

Council would welcome the opportunity to engage with both the Applicant and DPE regarding this outcome. This approach would enable one vision for development to be consistent with, rather than a dis-jointed approach which the current modification proposes.

ii. Master plan

Following on from Point 4 (i) (Urban Design) of this submission, in review of the Urban Design Report proposed to apply to the Applicant's portion of land, it becomes apparent when comparing Council's LLUDGL, to the Applicant's design pack there is significant changes to the urban form. Council highlights the poor urban design outcome that could occur, if 1 precinct has two separate urban design development controls that applies to different parts of the Precinct. The following urban design outcomes are raised:

Note: Whilst these are detailed DA design matters, it is imperative at a concept level that these matters are resolved.

- The Applicants Gross Building Area is inconsistent with the LLUDGL which requires 1090m² for over 8 storeys. The applicant proposes the following:
 - Building C – 1179m²
 - Building E – 1521m²
- The proposed urban design guideline amendment does not contain the Mews Roads in the required widths, locations or setbacks that is envisaged under the LLUDGL as shown by Figure 5. Full length and width Mews Roads should be provided in appropriate locations to support the additional GFA increase, particularly as it would result in more density within the Precinct. The Mews Roads purpose is to enable access (waste and residential) and provide space for car share arrangement in the precinct that would support reduced parking rates.

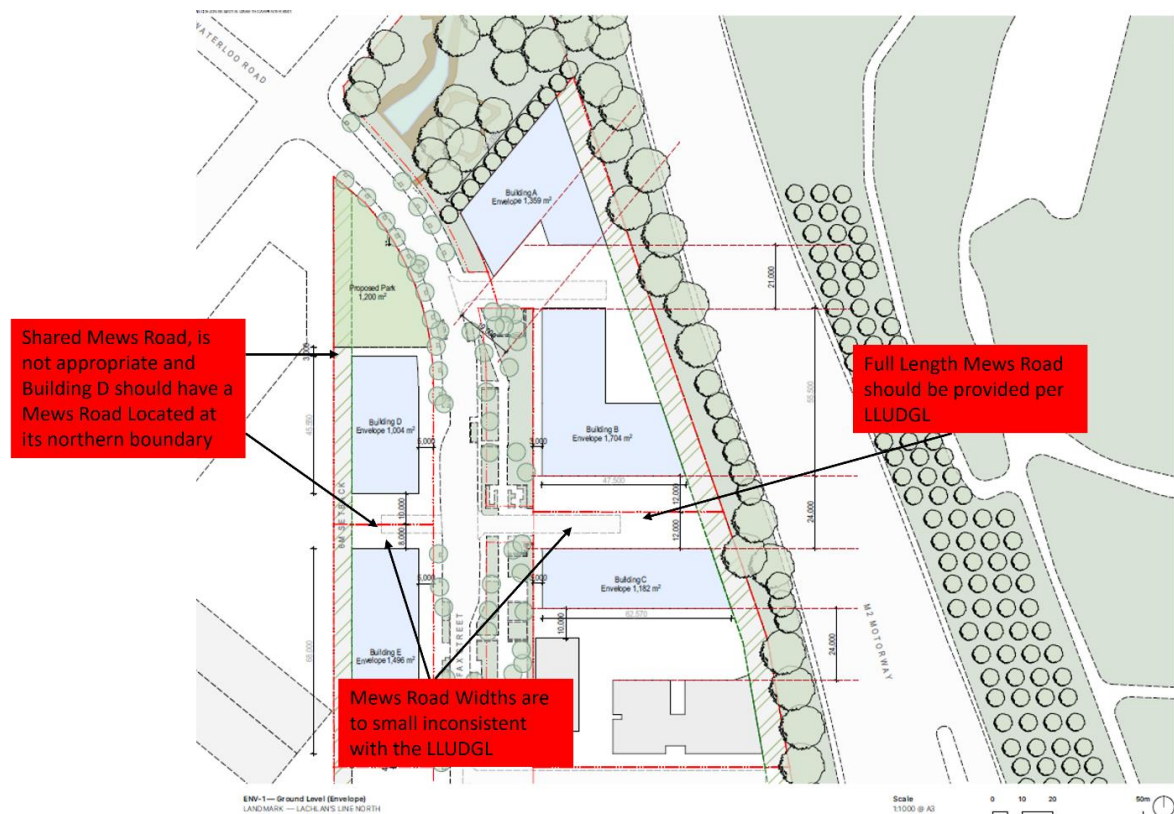


Figure 5: Markup of FJC Studio's Urban Design Report (Base Source: FJC Studio)

- Please refer to Attachment 2 for the design requirements of the Mews Roads.
- Building Staging. The Applicants Staging plan (Figure 13 of FJC Studio Urban Design Report) shows that 5 Halifax Street will be built in 2 stages, with the southern built form on the site being delivered under stage 1 whilst the northern aspect of the site being delivered under stage 4. Stage 4 contains the access point into stage 1, so it is unclear the strategy of delivering the access point into the site at a later stage. Without appropriate access to the site, it will be unable to be occupied. This should be revised.
- In review of the setbacks proposed in the FJC Studio's Urban Design Report the proposed buildings that are non-compliant with the ADG building separation distances (Figure 6 & Figure 7). 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 Lot 110, Lot 118 and Lot 119. Further clarification on building separations and building siting is required and compliance with ADG is required. Council contends that this matter should not be left to a detailed DA matter and should be resolved at a concept level. Further consideration should be given to a taller slender building for Building E, as situated on a lot with a 75m height control under the RLEP 2014. Any consideration to a taller and slender building should be complemented with amended solar studies examining the impact of shadows cast onto the Linear Park, and the Garungul Precinct.

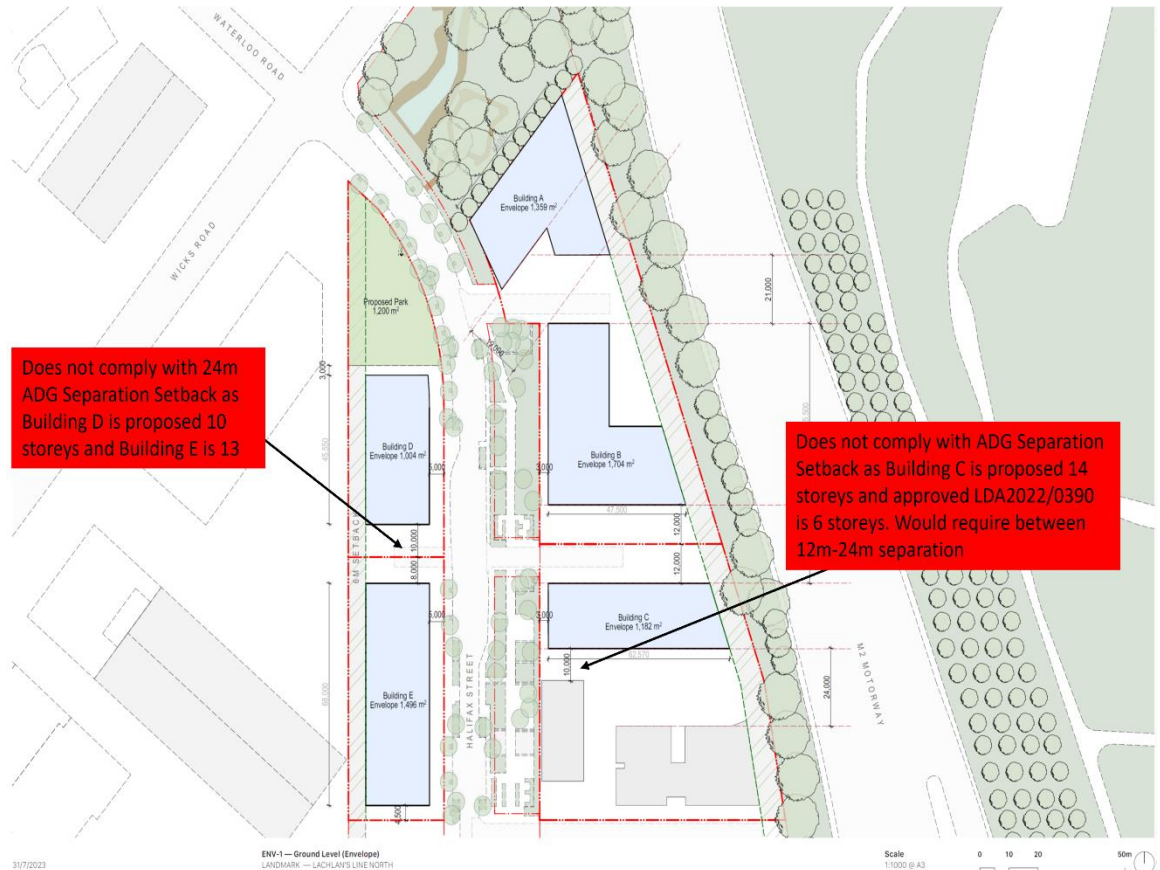


Figure 6: Markup of FJC Studio's Separation Plan (Base Source: FJC Studio)

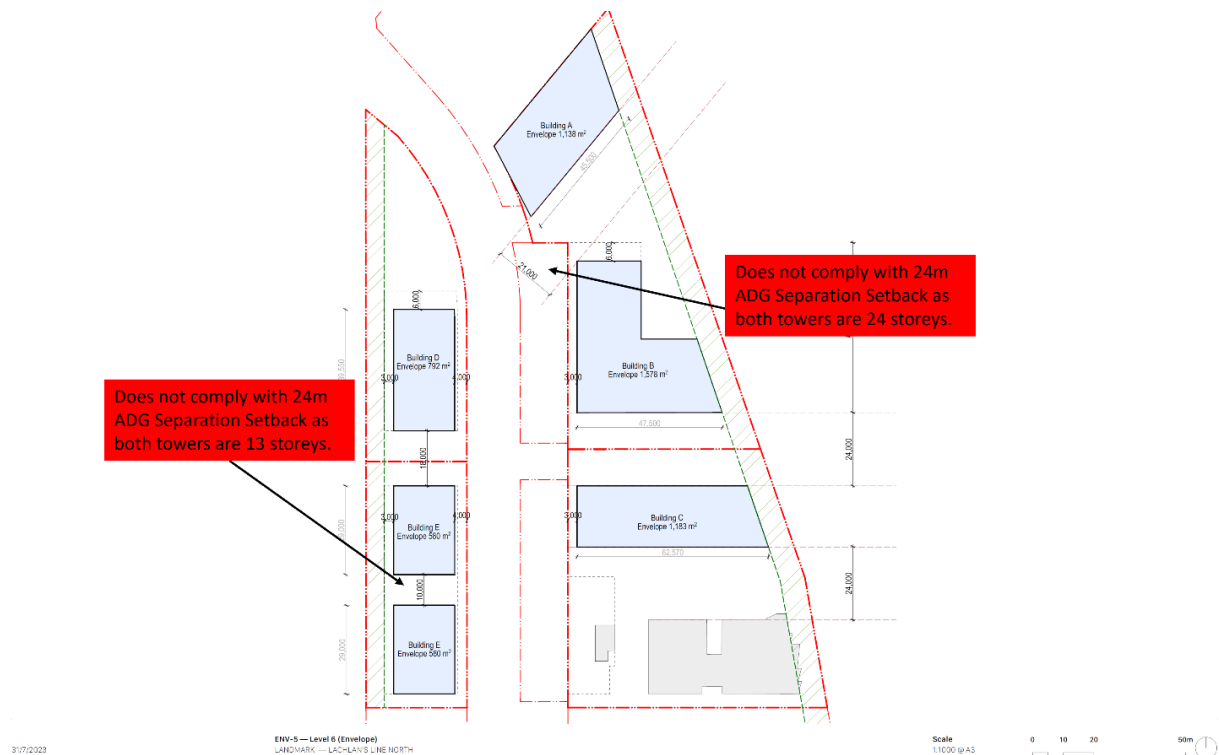


Figure 7: Second Markup of FJC Studio's Separation Plan(Base Source: FJC Studio)

Overall in review of FJC Studio's Urban Design Report, it appears to significantly differ from the vision under the LLUDGL and further refinement of the schemes urban design outcome is required as the scheme differs in outcomes such as access, setbacks, massing and affordable housing. As outlined above, the Applicant should proposed amendments to the LLUDGL and prepare an amended design guideline that would apply to the entire Precinct.

5. Substantially the Same Development

Council understands the Department must satisfy itself that the modification application is considered to be "substantially the same development" before approval can be granted. Notwithstanding, Council raises concerns that the significant GFA uplift, which was not considered under the original approval may not be considered as such. Council raises particularly concerns with the GFA uplift off:

- Lot 202 (Now Lot 110)
- Lot 207 (Now Lot 118)

Lot 202 is seeking a GFA uplift of 37,153m² from its approved of 25,626m², which is an increase of 11527m². This is approximately a 44.98% (45%) increase from what was previously approved. Lot 207 is now seeking a GFA uplift of 11,569m² from its approved 6,883m², which is an increase of 4,686m². This is approximately a 68.08% increase from what was previously approved.

Whilst no building envelopes were approved as apart of SSD-5093, the urban design report associated with this approval provided indicative envelopes, which were translated into Council's LLUDGL's which outlines indicative story heights for the precinct. The proposed storeys under SSD-5093-Mod-6 contemplate heights with a significant increase when compared to SSD-5093 with some lots being more than double (Figure 8). The cumulative effect of doubling (close too) both the storeys and GFA of these sites raises concerns from a substantially the same perspective as the associating massing wasn't previously considered, including the massing's impacts.

Separate to the above, Council raises concerns with the Applicants approach in considered Lot 202 (Lot 110) separate from the other sites although proposed to be modified as part of this application. The Applicant scheme references its approved under LDA2022/0390 and existing approved massing, therefore not being changed via this modification, however adds additional mass to part of the existing approval. This approach is not consistent with how master planning should be undertaken. Any amendments to the masterplan, must consider the massing wholistically. Any design amendments should consider the precinct wholistically, rather than piecing approvals together.

The Applicant is proposing that if MOD-6 is approved, then they would lodge a modification application to LDA2022/0390 seeking to modify its built form. This would then require the Council to be satisfied that LDA2022/0390 is “substantially the same” being at the discretion of the Council.

In this circumstance, it is inappropriate, for the subject application to seek considering the proposed built form arrangement as an “addition” to LDA2022/0390 as it would ostensibly be asking the Council and the Department to fetter its discretion on the matter, before any approval is granted to a future modification to LDA2022/0390, and further be assuming Council would consider their strategy is appropriate and could be supported via a future modification application rather than a new DA.

Council does not support the Applicants strategy at approaching preparing an amended masterplan and requests that it be amended to reflect a wholistic approach, rather than piecing application together. Council notes that Section (4) of this report raised numerous design issues, which are stemming from the Applicants approach at considering the massing as “existing” for LDA2022/0390 rather than considering the amendments to the masterplan wholistically.



Figure 8: Markup Comparing storeys under SSD-5093 to MOD-6-SSD-5093 (Base Source: FJC Studio (Left) and Batessmart (Right))

6. Transport, parking and traffic

The application includes a Traffic Impact Assessment (TIA) by PDC Consultants from July 2023. This TIA consists of the typical review of the surrounding transport services including public, active and road-based services, as well as traffic modelling which indicates that the proposed increase in GFA will have a negligible impact on the road network, subject to the pre-agreed upgrades to Wicks Rd/ Epping Rd in an approved VPA between Urban Growth and Minister for Planning (noting, these works have not been completed to date).

The focus of these comments will be on the proposed parking quantum and the proposed mode share split for the proposed development.

i. Resident and Visitor Parking

The proposed modification seeks to increase the GFA which is likely to yield an additional 173 apartments, depending on the dwelling mix. The consultant has used Council's DCP rates for the parking controls, which is the usual practice in transport planning/ traffic engineering, but this approach may not always be the most appropriate for a proposed development.

In this case, the proposal would yield a total of 1,161 residential apartments, with 1,116 parking spaces (residential and visitors). This is almost one space per apartment which is not appropriate given the proximity to the Metro, and bus services. Not only does providing this level of parking induce traffic, it also makes the development more expensive to construct which is then a cost passed on to the buyer. Additionally, there is a growing expectation in the market that housing close to high-frequency public transport will not necessarily include a car parking space. This concept is further enhanced by the fact that for over a decade the rate of people getting their driver's licenses is decreasing, and this is a trend that is bedding in rather than loosening in any way.

Council strongly recommends, and in line with recent meetings with the proponent, that the quantum of car parking is significantly reduced to ensure the development is transit-oriented rather than traffic-oriented to meet the expectations of the market and to ensure the development is fit-for-purpose as the transport environment continues to evolve towards shared services that are enabled by technology.

ii. Accessible Parking

Acknowledging the early stage of this proposal, the report mentions that accessible parking will be provided, but gives no further detail on quantum, compliance with the Australian Standard, or the intention to locate these spaces closest to lifts or key destination points. Council expects some further clarification on intent and location for these spaces.

iii. Motorcycle parking

Council requests that the proponent proposes a rate for inclusion in the development, and the basis for selecting this rate.

iv. Car share

Research and lived experience has demonstrated that one car share vehicle can remove up to 10 private vehicles from the street. Council strongly recommends the rate of residential and visitor parking is reconsidered, the rate of 1 car share space per 50 spaces should still be applied in this case which should yield approximately 20 car share spaces.

These spaces should be located as a combination of on-street spaces in highly visible locations,

and also within the car park, with access provided to the car share members. This is a common practice, and there are many examples including at Central Park in Chippendale with Go Get.

Future proposals should indicate car share quantum and indicative locations, plus an approach as to how the proponent will enter into an agreement with a car share provider such as Go Get or Hertz 24/7.

v. Bicycle parking

Residential bike parking should be in an easy-to-access part of the building, be accessible by residents.

Mode Share targets

Council is supportive of a shift away from private vehicle travel to public and active transport, and supports the direction of the mode share targets proposed in the TIA. The TIA outlines proposed mode share targets using the existing mode share in Macquarie Park as the baseline. The proposed mode share for the development is shown below:

Table 9: Travel Mode Share Targets

MODE OF TRANSPORT	EXISTING MODE SHARE	TARGET MODE SHARE
PRIVATE TRANSPORT		
Car, as driver	34%	20%
Car, as passenger	3%	4%
Motorbike / Scooter	1%	1%
TOTAL PRIVATE	38%	25%
PUBLIC TRANSPORT		
Train & Other	31%	35%
Bus & Other (excl. train)	11%	12%
TOTAL PUBLIC	42%	47%
ACTIVE TRANSPORT		
Cycle	1%	6%
Walk	19%	21%
TOTAL ACTIVE	20%	27%

Figure 9: Travel Mode Share Target Extract (Source: PDC Consultants)

Acknowledging the early stage of this work, it is unclear:

- The timeframe for the proposed targets to be met.
- How these targets were determined.
- Whether the proponent will employ a dedicated person to take responsibility for developing, managing, communicating and monitoring the travel behaviors within the development against the Green Travel Plan/s.
- How a 14% mode shift away from 'Car, as Driver' trips with the quantum of proposed parking in this application (see earlier comment about parking) can be achieved.
- Given the largest proposed mode shift is to cycling (a 5% increase from a 1% base) given the proposal is silent on where the cycle network exists and its status, whether or how the development will contribute to the cycling network, or how people will access the network from within the development and to what type of locations.

Council notes that despite this indication towards less car-based travel, the report itself is primarily focused on traffic and does not visualize items like walking or cycle catchments, paths or deficiencies in these elements that the proposed development will seek to resolve.

Green Travel Plans

Council is supportive of the implementation of Green Travel Plans (GTP) to guide the development towards its mode share targets.

However, in line with the comments above, the report states, *"Through further enhancement and implementation of measures to increase sustainable transport uptake, mode share of the site has the potential to move further away from the use of private vehicles and towards public and active transport modes"* and the GTP will need to clearly define:

- Measures to be put in place to attempt to achieve the targets.
- How the GTP will be measured and at what frequency.
- Who will be responsible for implementation and monitoring.
- How departures from the targets will be dealt with (e.g. achieving faster than expected, or falling below expectations)?
- Catchment analysis for active and public transport.

EV Charging

Council strongly supports the inclusion of EV charging and encourages the proponent to ensure these are located in visible and easy to access locations for residents and visitors. The proponent should also consider the opportunity to place some EV chargers in publicly accessible locations to maximise access to chargers in the area, which may also increase visitation to the retail at Lachlan's Line.

Street layout

While indicative, the proposed new streets that would service each of the towers on Lots 102 and 110 do not add to the public street network. Their only function is to facilitate access to the proposed towers.

The street layout should, be designed to allow for turnaround for vehicles that may need to turnaround, with consideration of urban design treatments that add to the place quality of the developments.

The application will need to ensure pathways are designed to Australian Standards that enable universal access, are well lit with passive surveillance (where possible), and where paths are shared they are to a sufficient width and design typology to meet the needs of the target users.

Cycleways should be designed for the likely user group and should be completely delivered to allow connection to the surrounding network. Council's City Transport, City Fabric, Traffic Services and Public Domain teams should all be actively involved in the development of the street network including any active or public transport infrastructure.

EXTERNAL TRAFFIC IMPACTS

Mitigation

It is noted that the traffic implications associated with the proposed development have been previously assessed as part of the approved concept masterplan for the North Ryde Station Precinct (Reference No. SSD 5093). The transport study prepared by Parsons Brinckerhoff forming part of the approved concept masterplan recommended the following infrastructure improvements within the surrounding public road network:

- 1) Signalisation of the intersection of Waterloo Road/Halifax Street/Wicks Road;
- 2) Additional turning lanes within Waterloo Road at its intersection with Lane Cove Road; and
- 3) Additional turning lanes within Wicks Road at its intersection with Epping Road

With regards to the abovementioned upgrades, item 1 has been completed and item 2 is to be provided as part of Transport for NSW's Macquarie Park Bus Priority and Capacity Improvement Project. Transport for NSW currently have no plans in place to undertake the upgrade of the intersection of Epping Road/Wicks Road (item 3).

Council raises concern with the Application from several perspectives and contends no approval should be granted until, they are resolved. Notwithstanding, Council can provide conditions on the scheme from a traffic perspective, should DPE request them. Of particular concern is the need for a condition that considers the precincts parking strategy and a reduced rate of parking, given the proximity to transport related infrastructure.

7. Waste

General Comments for future detailed DA's

Changes to GFA across the precinct can impact waste access and service areas. To ensure the delivery of essential services, adequate access needs to be provided for Waste Collection service vehicles, entry and exit in a forward facing motion. The details of the vehicles that will be used to conduct collections are available in the below link, due to the size of the complex and the number of units a 10.8m garbage vehicle will be required. An increase number in units will also require larger or additional bin rooms and a larger bulky waste rooms to cater to increases in waste generation. Please see link to Council Waste Trucks for the Applicants future benefit: <https://www.ryde.nsw.gov.au/files/assets/public/v/1/development/drawings/waste-drawings/wat.1.2-10.8m-garbage-trucks-turning-manoevre.pdf>

Council expects that the bins and services will be carried out in the basement and requires that all Council waste vehicles enter the site from the mews road access point.

Bin Rooms

The bin rooms in the complex need to be large enough to cater to the number of bins required for the development. Council services 1100L waste bins thrice weekly and 660L recycling bins twice a week. To meet the EPA's 2025 food organics mandate, additional bins should also be considered to allow resident to access a FO or FOGO service. The bin room will need to be adjacent to the loading area/collection point to ensure operational efficiencies. All waste rooms that need to be accessed by the contractor should be fitted with a universal key, details can be provided by Council's waste department.

Bulky Waste Rooms

A bulky waste room will also need to be made available to all residents to ensure that residents are able to dispose of their unwanted bulky waste material. Bulky waste rooms ensure that Cleanup is not presented on the nature strip and maintains the aesthetics of the area.

Conclusion

City of Ryde appreciates the proposed modifications, however in its current arrangement further information is required on gross floor area, affordable housing, open space outcomes and urban design arrangements to ensure the masterplan can sufficiently handle the additional density in the future.

Council request that the Department of Planning not approve the application in its current form for the number of deficiencies raised in this submission. Particularly as the scheme doesn't provide sufficient infrastructure to support the additional density. As outlined above, Council and the Applicant must enter into a VPA to address these concerns. **No approval should be granted by DPE until such VPA for open space has been executed with Council.**

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 any approval is granted. Council can provide recommended conditions relating to transport and urban design.

In the applications current form, Council **objects** to it.

End Advice