

PRELODGE MENT PANEL ADVICE EIS CONSULTATION AND ADVICE

PROPERTY: 363-373 Victoria Road and 44-48 Eltham Street,
Gladesville

MEETING DATE: 4 August 2025 **TIME:** 2pm to 3pm

PRELODGE MENT No: PRL2025/0029 - SSD-82225458

DEVELOPMENT: Demolition and construction of a 12-storey mixed use residential development, including retail premises, 186 residential dwellings, basement parking and associated landscaping and deep soil.

ATTENDANCE:

Council:

| | |
|----------------|---|
| Nicholas Najar | Acting Senior Co-Ordinator Development Advisory Service |
| Mark Taylor | Senior Coordinator Park Planning |
| Daniel Pearse | Senior Coordinator Engineering & Landscaping Services |
| Amir Mousavi | Senior Coordinator Transport Development Services |
| Robert Platt | Development Contributions Coordinator |
| Terry Agar | Senior Strategic Planner |
| Justin Byrne | Senior Civil Engineer Activation & Compliance |
| Teresa Pereira | Senior Architect |
| Tony Collier | Senior Town Planner |
| Adam Hamawi | Team Leader Waste |

Proponents:

| | |
|----------------|-----------------------|
| James Colling | Woolworths |
| Ashleigh Ryan | Beam Planning |
| Taylor Condon | Beam Planning |
| Jordan Curran | Clarke Hopkins Clarke |
| Natalia Zapata | Clarke Hopkins Clarke |
| Connor Hoang | Ason Group |
| Rhys Hazell | Ason Group |

NOTES FOR PROPONENTS

The Application is proposed under the State Significant Development Pathway with the Department of Planning Housing and Infrastructure being the consent authority. This advice serves as a record of Council's consultation and detailed advice provided to the Proponent to assist them prepare their Environmental Impact Statement (EIS).

This advice contains technical advice that is recommended to be considered and addressed in any EIS submission. The Pre-EIS advice does NOT constitute a formal assessment of your proposal and at the time of EIS Lodgement Council will undertake a detailed review of the complete application. A complete application should address this advice and respond to the issues raised.

THE PROPOSAL

The application seeks a concurrent rezoning and development approval pathway as per the Housing Delivery Authority recommendation. The proposal seeks to rezone the current planning framework under the Ryde Local Environmental Plan 2014 (RLEP 2014) to permit the development sought under the SSDA. The proposal is split into the following elements:

Rezoning Proposal

The concurrent rezoning will seek to enable a mixed-use shop-top housing development on the site through the following amendments to the RLEP 2014 (Figure 2):

- Amend the Land Zoning Map for the site to reflect a MU1 – Mixed Use zoning (noting that the site is currently fragmented with a mix of MU1 – Mixed Use, E3 – Productivity Support and R2 – Low Density Residential zoning);
- Amend the Height of Buildings Map for the site from a range of 9.5m to 22m, to a range of 19.5m to 49.5m; and
- Amend the Floor Space Ratio Map for the site from a range of 0.5:1 to 3:1, to a uniform 4:1 across the site

The Residential Flat Building (RFB) Land use is already permitted on the site by virtue of Schedule 1 Clause 21 Additional Permitted Use (APU) under the RLEP 2014.

SSDA Proposal

Construction of a 12-storey mixed use residential development fronting Victoria Road, comprising (Figure 3):

- Demolition of existing buildings
- Removal of eight (8) trees
- Bulk excavation to a depth of approx. RL 39.8m
- Construction of a mixed-use development comprising:
 - basement carparking including 416 parking spaces accessed from Eltham Street and loading dock accessed from Westminster Road
 - ground level supermarket and retail premises, including lower ground 'direct to boot' area with a total retail gross floor area (GFA) of approx. 4,209sqm
 - up to 12-storeys of shop top housing including approx. 172 apartments with a total residential GFA of approx. 17,034sqm comprising: 19 one-bedroom apartments
 - 119 two-bedroom apartments
 - 34 three-bedroom apartments
 - 5% of residential floor space will be used as affordable rental housing for a minimum 15 years
- Installation of signage
- Landscaping works including public domain upgrades and communal open space
- Augmentation of infrastructure as required
- Stratum subdivision
- Operation of the supermarket and retail premises between the hours of Monday to Sunday – 7am to 11pm (indicative)

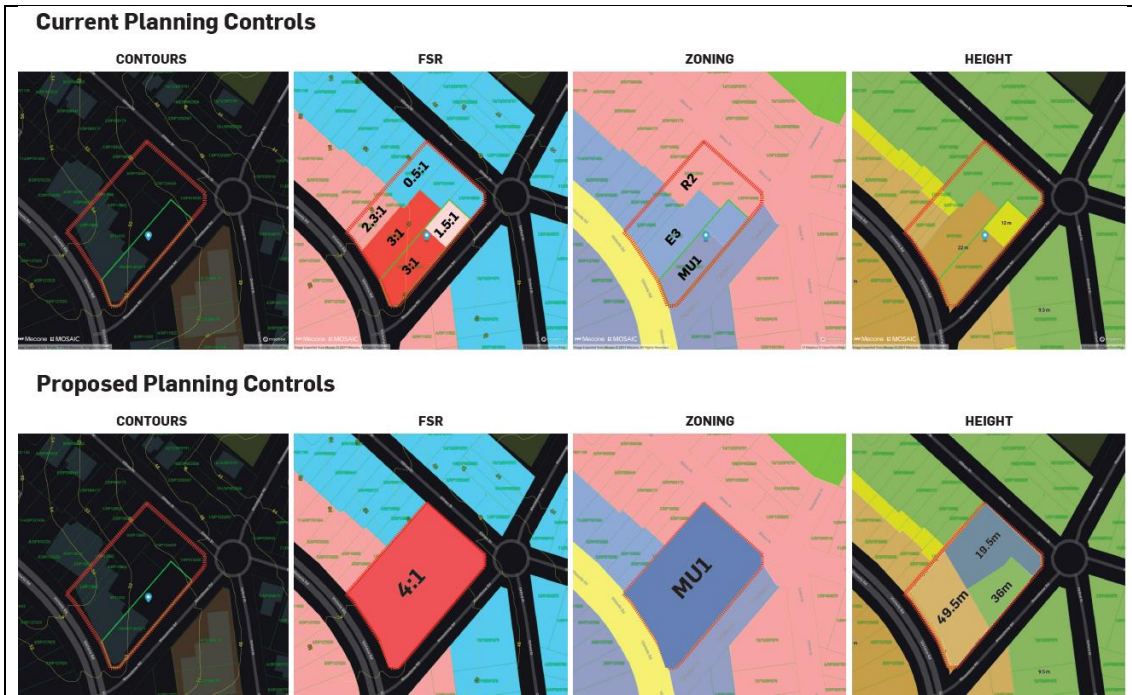


Figure 2: Summary of Proposed Rezoning (Source: Studio SC Architecture)



Figure 3: Eye view of Proposal (Source: CHC)

APPLICABLE STATUTORY PLANNING CONTROLS & POLICIES

Statutory Planning Controls

The following instruments are identified as applicable to the development:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *State Environmental Planning Policy Housing 2021*
 - *Chapter 4 Design of residential apartment development*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *Ryde Local Environmental Plan 2014*
- *Ryde Development Control Plan 2014*

Applicable Environmental Planning Instruments

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) applies to the development. Any development application submitted must demonstrate consistency with its aims and objectives. The development will be considered under *Division 4.7 State Significant Development of the EPA Act* and DPHI will be the consent authority.

As the application seeks the concurrent rezoning of the site, part 3 of the EPA Act also applies to the proposal. Any submitted EIS will require to demonstrate that there is strategic and site-specific merit. Council recommends that any EIS undertake a detailed strategic analysis against:

- *Ryde Council Local Strategic Planning Statement*
- *City of Ryde Council Housing Strategy (addendum)*
- *Ryde to 2035: Community Strategic Plan*
- *City of Ryde Affordable Housing Policy 2016 - 2031*
- *Ryde Resilience Plan 2030*
- *City of Ryde Open Space Future Provision Strategy*
- *City of Ryde Sports Fields Action Plan - Towards 2036*

Council seeks a detailed EIS that demonstrates there is strategic merit and site specific merit to support the application.

Environmental Planning and Assessment Regulation 2021

The *Environmental Planning and Assessment Regulation 2021* (EPAR 2021) applies to the development. The submitted application is required to be consistent with its requirements, under *Part 3 Development applications* and other relevant sections of the *EPAR 2021*.

State Environmental Planning Policy Housing 2021 - Chapter 4 Design of residential apartment development

Chapter 4 of the Housing SEPP applies to the development. The Applicant is advised to meet compliance with controls contained in the Apartment Design Guide (ADG).

Although the proposal is in its early stages, it will be a requirement for any future proposal to demonstrate that the proposed building envelopes can accommodate ADG-compliant apartments.

Council is committed to ensuring that high quality RFB's are constructed. The RFB component is principally supported however further ADG compliance matters require attention. Council provides the below ADG commentary for the applicant to address in any EIS Submitted.

Part 3D - Communal and Public Open Space.

The applicant has stated that Communal open space is provided that is 1,645m² in size. Council's calculation shows the Communal open space as

- Central Podium: 401m²
- Roof (Building B): 581m²
- Roof (Building A): 30.3m²
- Total: 1,012.3m² (18%)

Further detailed calculations of communal open space is required that clearly shows the areas of inclusion and areas of exclusion consistent with the ADG's requirements.

3F Visual Privacy

Council notes that the application proposes minor non-compliances with the ADG building separation and Privacy outcomes.

Levels 4 to 8

Balconies between Building A to Building B: 14m (Req 18m).

Units Affected

- A-505 & A-506 to B-503.
- A-605 & A-606 to B-603.
- A-705 & A-706 to B-703.
- A-805 & A-806 to B-803.

Plan 04.02 indicates provision of privacy screens as solutions. This addresses privacy but not building separation. Notwithstanding, the encroachments are minor when divided between the opposing units and involve balconies as such Council considers this an acceptable outcome.

The EIS must adequately justify the variation of building separation and visual privacy.

4D Apartment Size and Layout

Under Chapter 4 of the Housing SEPP clause 148 Contains non-discretionary development standards, that must be considered. The Applicant is advised to comply with these requirements.

Of note is clause 148(2)(b) which requires minimum areas of apartments to be consistent with Part 4D of the Apartment Design Guide (ADG). Clause 4D of the ADG is shown in **Error! Reference source not found.** In review of the submitted plans, its shown that some apartments do not comply with the minimum internal area under the ADG.

Whilst the applicant hasn't resolved detailed internal specifics that would affect apartment sizes, it appears that there are several 2-bedroom units that are below the 75m² room requirement if a second bathroom is proposed (Figure 5).

Note: *The applicant is advised to carefully review all their apartment sizes on SSDA submission to ensure compliance with the minimum apartment area and is recommended to comply with apartment size requirements.*

Design criteria

1. Apartments are required to have the following minimum internal areas:

| Apartment type | Minimum internal area |
|----------------|-----------------------|
| Studio | 35m ² |
| 1 bedroom | 50m ² |
| 2 bedroom | 70m ² |
| 3 bedroom | 90m ² |

The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m² each

A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m² each

Figure 4: Extract of ADG Apartment Sizes (Source: ADG)

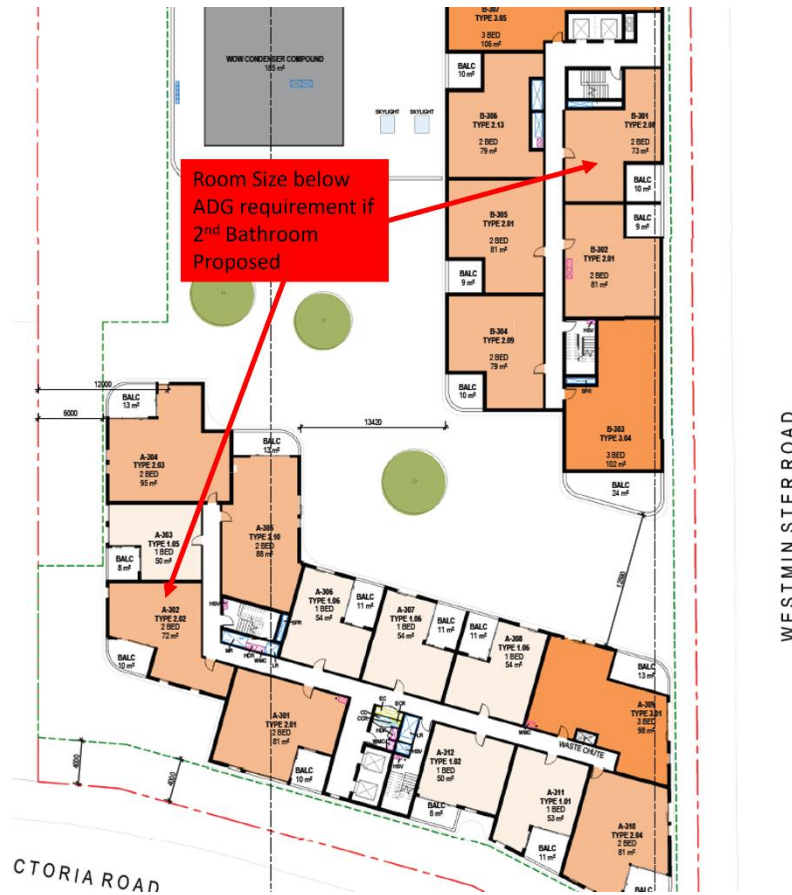


Figure 5: Markup of Plans showing potential ADG Non-Compliance (Base Source: CHC)

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 Remediation of land

The requirements of Chapter 4 of the Resilience and Hazard SEPP will apply to the site. In accordance with 4.6 Contamination and remediation to be considered in determining development application of the Resilience and Hazard SEPP. It is understood that a Contamination assessment will be provided with the EIS as required by the SEARS.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The EIS should address the relevant clauses under this Environmental Planning Instrument (EPI).

Clause 2.120 *Impact of road noise or vibration on non-road development*, should be reasonably satisfied upon submission of the EIS. A Noise and Vibration assessment is to be undertaken and provided with the EIS.

State Environmental Planning Policy (Sustainable Buildings) 2022

The development will trigger the requirements of the Sustainable Buildings SEPP. The EIS should demonstrate compliance with Chapter 2 of the SEPP. BASIX Certificates are required to accompany the application addressing the residential component of the development.

A detailed ESD report is to be provided with the application. Council particularly emphasises demonstrating that:

- Water consumption is reduced.
- Reduce energy and electricity use where possible and use renewable energies.
- Minimise waste from construction and consider circular economy principles to reduce carbon footprint.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 Vegetation in non-rural areas & Chapter 6 Bushland in urban areas

The proposal involves the removal of numerous trees on the site. The EIS will need to demonstrate that trees must be replaced in accordance with *Section 6 of the Urban Forest Technical Manual* (to effectively maintain the Urban Forest canopy). Council will be seeking a 3:1 replacement ratio of trees. Should replacement tree planting not be provided on site, a condition of consent requiring a replacement tree fee be paid to Council is required.

RYDE LEP 2014

Zoning and Permissibility

Noting that the application seeks to concurrently rezone the land from E3, MU1 & R2 to MU1, Council seeks that the application provide robust justification for the loss of Council's employment lands.

Employment Lands

Whilst the APU for a residential accommodation that permits an RFB on the site, Council considers that the loss of employment lands (E3) is of concern. Relevant to the applicant's EIS is the Minister 9.1 directions that are required to be addressed in the EIS. Specifically, as it relates to employment lands is *Direction – Focus 7 Industry and Employment*.

A Planning Proposal must give effect to the 9.1 Direction and the objective of the direction is to minimize loss on employment lands and protect employment lands. Council's primary objective for this locality (North Gladesville Precinct) is ensuring that a cohesive built form occurs that supports a corridor of mixed retail, commercial and residential uses.

To ensure that the vision of this locality is achieved, and that appropriate levels of employment are maintained given that the application will be removing employment lands, Council considers that the application should consider the following:

- The application commits to a minimum non-residential floor space component in the planning proposal element of the application, or;

- The applicant commits to a condition of consent requiring that the ground floor of the development be solely used for commercial activities in perpetuity of the development.

Council considers that as this application is a spot rezoning the principles of the primary zone that applies to the site (E3) should be incorporated into the proposal, that being ensuring ground floor activation with commercial land use occurs.

Retail Premises

The current planning framework predominately prohibits retail premises in the E3/R2 zone whilst the small part of the site being zoned MU1 permits retail premises which is approx. 10-15% of the total site area. The proposed full line supermarket is a type of retail premises currently prohibited in the planning framework.

The rezoning component of the EIS must adequately demonstrate that there is strategic and site specific merit for introducing a prohibited land use into the planning framework.

Height of Building

Noting that the application seeks to concurrently change the building height as shown in Figure 6, the applicant is advised to carefully consider their proposed height strategy.

Based on the plan it appears that the application as proposed would necessitate a clause 4.6 for building height as a portion of the 7-story building would extend into the proposed 19.5m building height area. This is demonstrated in Figure 7 & Figure 8. It is recommended that:

- The applicant reconsider their height strategy over the site to avoid a technical non-compliance. Or;
- Provide a Clause 4.6 for Building height if still proposed.



Figure 6: Applicants proposed Building Height (Source: CHC)

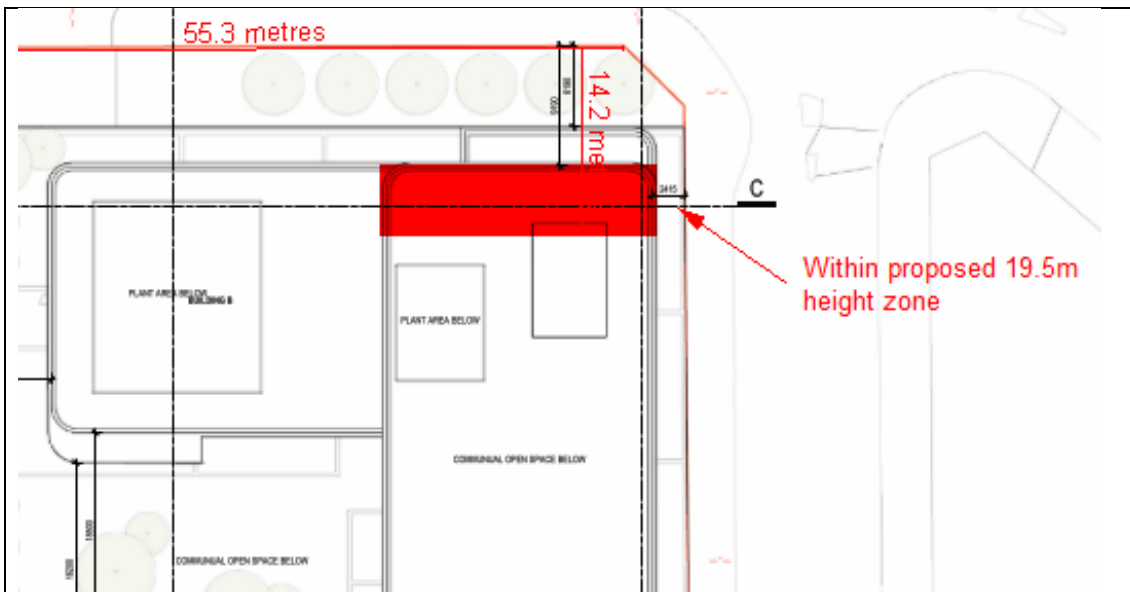


Figure 7: Mark up of area where Building Height would encroach (Base Source: CHC)

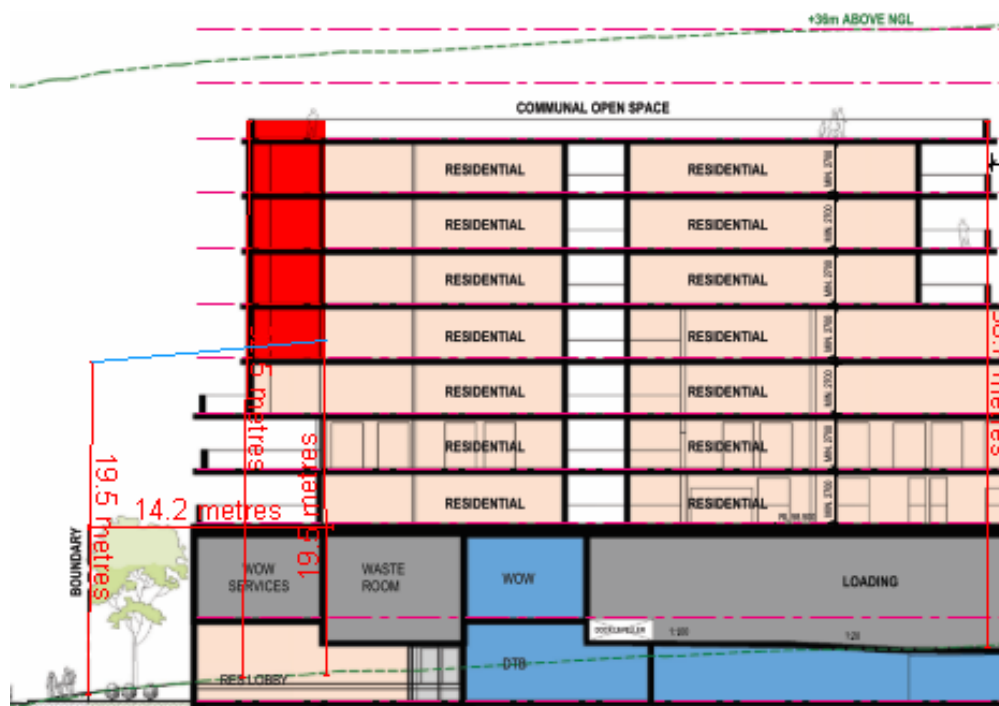


Figure 8: Mark up of Section showing height breach of proposed controls (Base Source: CHC)

The Applicants proposed height strategy across the site is supported in principle. Council notes that the applicant's height interfacing the low density receivers is generally supportable.

Its noted that the surrounding planning context of the site forms part of the Low to Mid Rise (LMR) Provisions under Chapter 6 of the Housing SEPP. The EIS must demonstrate that the proposed building interfacing the future Low to Mid Rise development is appropriate and compatible. It's noted that future development in the LMR areas can benefit from a building height of approximately 12.5m if a future applicant applies the 30% bonus infill provisions.

The Applicants Built form strategy of focusing the building height towards Victoria Road and then transitioning lower building forms towards Eltham Street is generally suitable. Council seeks that the applicants EIS adequately justify the proposed Building Heights considering the existing planning framework and surrounding locality.

The applicant is to provide a detailed urban design study that considers:

- Visual impact of the proposed built form, particularly from low density receivers
- Skyline analysis of the site in the context of the Victoria Road Corridor, showing the proposed height.
- Detailed solar studies (its noted that shadows will primarily fall onto Victoria Road)
- Proposed Built form interfacing low density receivers and its compatibility in the sites context
- Demonstrates Wind Impacts are appropriate and are mitigated by the development.

Floor Space Ratio

It's noted that the applicant proposes to change the Floor Space Ratio (FSR) that is currently fragmented across the site, to a uniformed 4:1. The Applicants provided scheme suggests that FSR is proposed at 3:78:1 which would comply with the applicants proposed FSR.

The Applicants proposed 4:1 FSR is generally supportable, subject to Urban Design studies demonstrating that the site can support the proposed built form and associated bulk and scale impacts are appropriately mitigated.

The existing FSR for the site is predominately a 3:1 FSR, with the proposed increase to 4:1 not a significant increase of floor space above what is ordinarily permitted.

Stormwater Management

Clause 6.4 of the RLEP 2014 applies to the development. On EIS Submission a Detailed stormwater plan is required. Council notes that a draft stormwater plan was provided for review. Council provides the below feedback to be addressed in the EIS:

- There is an inconsistency noted between the architectural and stormwater plan in regards to the OSD storage. It is assumed that this will be addressed in the final submission, given the proposal is in a conceptual stage. The following comments however relate to the Stormwater (Civil) Plans provided.
- The OSD storage does not appear to have any surface grates for access, with only two access holes mounted on the side of the tank. Such a configuration is poor given that it will be difficult to readily access the tank for maintenance. Additionally the arrangement lacks an exposed opening (grate) to accommodate any failure mode, required in the event the tank overflows due to blockage in the downstream system or extreme storm event. It is warranted that surface grates be provided above the tank for access and that the tanks be placed mindful that any surcharge flow is directed towards public domain areas (ie Victoria Road footpath).
- The lowest end of the site is in the northeastern corner. OSD should ideally be located in this area.
- Considering the proximity to the inground public drainage service, a direct connection to this service must be provided.

Council recommends that the above is considered as the Applicant prepares their EIS.

Environmental sustainability

RLEP 2014 Clause 6.6 applies to the development as it includes development with greater than 1500m² in a mixed-use zone. The EIS should demonstrate that the requirements of the Clause are incorporated into the project.

Ground Floor Development in land zoned E3

As noted under Council's advice heading "**Zoning and Permissibility**" the applicant seeks to remove the E3 zoning from the site. Under the current Planning framework, Clause 6.7 of the RLEP 2014 applies to the development.

Council remains concerned that the intent of Clause 6.7 of the RLEP 2014 will be lost in the subject application as should the application be approved future development removes the ground floor supermarket use, it could be converted to residential accommodation (which the current zoning prohibits by virtue of Clause 6.7 applying to E3 zoned lands) as it would be permitted in the proposed zone.

Council will seek that any application that rezones Council's employment lands seeks to preserve the intent of Clause 6.7 in any detailed application. As such Council recommends that:

- The application commits to a minimum non-residential floor space component in the planning proposal element of the application, or;
- The applicant commits to a condition of consent requiring that the ground floor of the development be solely used for commercial activities in perpetuity of the development.

Schedule 1 Additional Permitted Use

The site is identified as benefiting from an additional permitted use (APU) for residential accommodation under Clause 21. Clause States:

21 Use of certain land in Zone E3

(1) *This clause applies to land identified as "Area 3" on the [Additional Permitted Uses Map](#).*

(2) *Development for the purposes of registered clubs, residential accommodation and food and drink premises is permitted with development consent.*

Whilst the APU permits residential accommodation, the proposed MU1 zoning also permits the residential accommodation. Council seeks that the applicant seek to amend the schedule to remove the site from the APU map, given the residential accommodation permissible will be addressed in the MU1 zoning. On EIS submission maps prepared by the applicant are to be submitted that show the APU is removed from affected sites.



Figure 9: Mark up of RLEP 2014 APU Map (Base Source: Ryde Maps)

Ryde Development Control Plan 2014

The site forms part of the Gladesville Town Centre and Victoria Road Corridor, for which Council has a site specific DCP that applies to the proposal. The site forms part of the North Gladesville Precinct.

On EIS Submission, Council seeks that the applicant seek to adopt the relevant characteristics for development as described in DCP 4.6. The EIS is to include a detailed compliance table against DCP 4.6 Gladesville Town Centre and Victoria Road Corridor. Key controls to address but not limited too:

- 3.1.2 Active Street Frontages
- 3.1.4 Setbacks
- 3.1.5 Rear Setbacks and Residential Amenity

Whilst it is noted that DCP's don't apply to SSD applications which is given effect by Clause 2.10 of the Planning System SEPP, it does not mean its provisions and outcomes are to be disregarded in the assessment of the application.

Given that the surrounding locality contains developments approved by Council which apply the DCP in its assessment, to maintain consistency in the urban outcome, an assessment against its provisions and how the development responds to them is required.

Comments/issues raised by Council's Pre-lodgement Panel

A pre-EIS meeting was held with Council on 4 August 2025 and Council's preliminary comments provided. This advice provides additional comments and issues that the Applicant needs to address prior to the lodgement of any application. Given the preliminary nature of the details provided, it should be noted that the following does not constitute a full exhaustive list of all applicable requirements. The following matters are included for the proponent's consideration:

- *Contributions and Public Benefit*
- *Open Space Impact*
- *Landscaping*
- *Strategic Planning*
- *Economic development*
- *Urban Design*
- *Drainage*
- *Traffic*
- *Waste Management*
- *Public Domain*
- *Vehicle Access & Accommodation*
- *Affordable housing distribution and Amenity*

Contributions and Public Benefit

The proposal seeks to significantly intensify development on the site. This will increase demand for infrastructure and services above what has been anticipated in the City of Ryde Section 7.11 Contributions Plan.

The Applicants draft package does not adequately assess the proposal's impacts on local infrastructure. Therefore, the application does not demonstrate that it is suitable for the site (or how it can be made suitable for the site). This is a key consideration for the assessment of site specific merit.

The traffic report and associated modelling must be updated to reflect an appropriate level of background growth. This includes the anticipated growth from the recently gazetted Low and Mid Rise Housing Policy, which applies to most of the land within 800m of the site.

The application must identify and address the open space and recreation needs of the proposed residential development. This is particularly important as there is no latent capacity in existing open space in the surrounding catchment. The application must identify how this demand can be addressed. It is suggested that additional capacity could be provided through the embellishment of existing open space to increase the quality and available hours of use.

Due to the significant intensification of development that increases infrastructure pressures beyond what is envisaged under the 7.11 plan, Council considers that the applicant must engage Council with a Planning Agreement to address the pressures on Local infrastructure the development generates.

Council seeks that further engagement occurs on this matter and that any EIS Submitted should include a Draft Letter of offer. The offer could include:

- Upgrades to local traffic infrastructure (as identified by Council/ expert reports)
- Upgrades to local parks as a result of increased usage by increased households
- Works in kind agreements/ Monetary contributions for local infrastructure.

Without further consideration of future infrastructure demand generated by the rezoning, it is unclear how the applicant can satisfy item 3 of the issued SEARs.

Open Space Impact

It's noted that the Ryde LGA has an acute deficiency in open space with additional density proposed (such as Macquarie Park TOD rezoning), the additional population is adding significant pressures on Council's existing open space network and it is unable to cater for the additional population.

It's noted that the proposal does include retail spaces include supermarket and café however it does not propose any open space, parks or community infrastructure to cater for the additional population envisaged under the existing 7.11 plan. Therefore, Council considers that the project will place additional pressures on the Ryde LGA's limited open space and must address this matter.

Council seeks that the EIS be supported by a detailed open space and associated infrastructure demand analysis. The infrastructure analysis should consider Council's strategic open space frame work in:

- City of Ryde Open Space Future Provision Strategy
- City of Ryde Sports Fields Action Plan - Towards 2036

The infrastructure demand analysis must consider the following matters:

- Monash Park is within 200m of the development site, and Westminster Park is approx.500m. Monash Park sufficient size (in terms of meeting the NSW Government Architect's Greener Places guidelines) and would be expected to meet the active and passive recreation needs of the incoming population.
- Monash Park is a neighborhood park located on Ryde Road in Gladesville. Anchored by a sports oval with a grandstand, it doubles as an official off-leash dog area and includes a small play space.
- Regional analysis notes this section of Victoria Road has limited open space and recreation facilities within a 1km catchment.
- A broader Social Impact Assessment should be considering the cumulative impact on community and open space infrastructure from the proposed development and any approved ones within a 2km radius of the proposed development site.

- An outline of how the existing infrastructure and any proposed new infrastructure can meet the community needs should then be provided.
- The application must clearly identify and address the open space and recreation needs generated by the proposed residential development. This is particularly important as there is no surplus capacity within existing open space in the surrounding catchment. The proposal should not rely solely on the existing network of parks, which was designed to serve the needs of the current low-density suburb. Instead, it must demonstrate how the increased demand will be met, including opportunities to embellish and upgrade existing open space so that its quality, functionality and hours of use are enhanced to support both the existing community and the future population created by the development.

Landscaping

- The arboricultural report provided indicates that 8 trees are to be removed and 1 tree retained. Tree replacements created by the development should occur on a 3 for 1 basis and a condition placed on the development that if replacement trees cannot be planted on the site then a monetary contribution is made to Council in accordance with the City of Ryde's fees and charges for planting trees on public land.
- Clarification is needed in the communal open space as it shows a large tree growing in this area. As it is located above a supermarket it is unclear how a tree of that size will be able to grow. Detailed sections showing soil depths are required.

Strategic Planning

It is unclear how the concurrent rezoning process and SSD process would align as this is a new planning process established by the Housing Delivery authority declaration. It is understood that the issued rezoning SEARs requires that an EIS demonstrate that there is strategic and site-specific merit. As requested in Council's SEARs advice, it is requested that the following matters be demonstrated in the EIS:

- The proposal was declared a SSD with a fast-track rezoning by the Housing Development Authority because it had the strategic merit and construction ability to deliver high numbers of dwellings quickly.
- Current planning for the Gladesville Town Centre always sought to limit Mixed Use development along Victoria Road. The proposal significantly expands the area of Mixed Use development and is inconsistent with the planning strategy for this locality
- The E3 Productivity support zone acknowledged the need for industrial goods and services businesses to support the local economy and the local community. The proposal replaces diverse businesses and services with one type of retail service.
- The interfacing of commercial retail development with the Eltham Road residential area is inconsistent with the planning strategy for this locality and lacks strategic merit.
- Residential accommodation at a mid-rise scale was contemplated as additional permitted use over the E3 zone with a height control of 22m stepping down to 12m to interface with existing residences with opportunities for ground and first floor commercial floor space. The proposal substantially exceeds the current planning strategy for the locality and requires further justification in the EIS.
- An assessment of demand for recreation land for open space created by the development is needed that fulfils the strategic requirements of the Greater Sydney Plan, North District Plan and LSPS.
- Strategic and site-specific strategic merit assessments should also address the objectives of planning authority strategies and plans that are not achieved by the proposal. This would permit a more balanced assessment of the merits of the rezoning proposal. The current selective approach of discussing only the achievement of strategic directions that support the proposal is too narrow.
- Loss of industrial land for urban services which contrary to the 9.1 Ministers Directions requires further analysis.

Other Matters for consideration

- Local economic impact of loss of industrial land/urban services – submitted economic impact assessment only addresses the retail supermarket economy and does not consider the industrial lands being lost. A revised economic assessment is required that considers loss of employment lands.
- Include non-residential/non-supermarket commercial floorspace planning controls similar to those applying to Macquarie Park TOD rezoning to support the local economy and jobs – not addressed.
- The applicant should consider that their proposed maximum heights should be expressed as RLs to address the sloping site with roof top services. This approach was considered in the rezoning of the Bunning Site at 495 Victoria Road.
- Open space provision as it relates to residential amenity and social impacts (cumulative impacts of all potential residential developments) – not addressed
- Noting that the applicant seeks to rezone the land particularly the E3 component, the applicant could conversely seek to rezoning the all land to E3 and proposed retail premises as an APU under Schedule 1 of the RLEP 2014. By maintaining all lands as E3 it preserves employment lands whilst the existing APU would permit the shop top housing component
- Future character of Victoria Road should be envisioned. Cumulative impacts of new development are to be considered.

Economic development

Increasing economic diversity

Victoria Road continues to show a pattern of underutilised and vacant light industrial and commercial properties, and the proposed development presents an opportunity to stimulate economic activity along this corridor. The inclusion of active shopfronts and ground-floor retail has the potential to significantly enhance the street's appeal, diversify services available to the local community, and contribute to vibrancy throughout the day/evening. This is particularly relevant given the site's location opposite a school and in proximity to a local sporting oval, both of which attract consistent pedestrian activity.

Supporting pedestrianization

The proposal is not expected to significantly impact the existing Gladesville village high street or local shopping centres within a 5km radius. The development may help address limited food and beverage offerings within the immediate (a five-minute walk) catchment. With improved wayfinding and connectivity, the site has the potential to increase foot traffic to surrounding local businesses and support extended dwell times.

Demographic profile

In the economic impact analysis has identified the potential creation of 1,420 jobs as a result of the development, both directly and indirectly, including a conservative estimate of 168 ongoing retail roles. Notably, 4.9% of Gladesville's population is aged 15–19 years (approximately 516 individuals), and retail employment is a key entry point into the workforce for this demographic.

Future land-use planning

While the development offers clear economic benefits, it also highlights the importance of maintaining a balanced land use mix. Without a long-term vision for the surrounding precinct, the gradual loss of light industrial spaces may reduce capacity for urban manufacturing and lower-margin business activities. This may impact local economic diversity if not addressed strategically.

Urban Design

Overshadowing of Children's play area

The provided shadow diagrams show the children's play area starts getting shadows from the proposal from noon onwards. Typically, shadow diagrams are studied 9am-3pm, and school finishes at 3pm, but like most schools *Our lady Queen of Peace* have an afterschool program/care service which runs from 3pm-6pm.

This afterschool services provide active and recreation activities. Therefore, it is important to look at the specific times and uses of the adjoining school and ensure we are not impacting the amenity and use of that space. Council seeks that the urban design study accompanying the EIS considers shadow impacts to the schools open space past 3pm to quantify expected impacts.

Visual Impacts along Eltham Street and Westminster Road.

The visual impact assessment needs to consider the bulk and scale along Eltham Street and Westminster Road and potentially from Monash Park. Particularly for existing and future residents. The 12m and 9m existing height limit to the corner of Westminster and Eltham seems more appropriate in the existing context and scale of the surrounding residential.

Council recommends that the building interface with these receivers demonstrates there is appropriate building setbacks particularly for the high rise component to ensure a compatible interface with low density receivers and to maintain the low density character of Eltham Street.

Pedestrian access and amenity.

The school gate along Westminster Road is the primary access for people walking or riding to school. The vehicular access and kiss and drop are along Oxford Street. A key element of encouraging people walking and riding to school is providing a safe environment to do so. This school zone should minimise vehicular access and movement. In particular, movement of large loading vehicles that have difficulty seeing a primary school child.

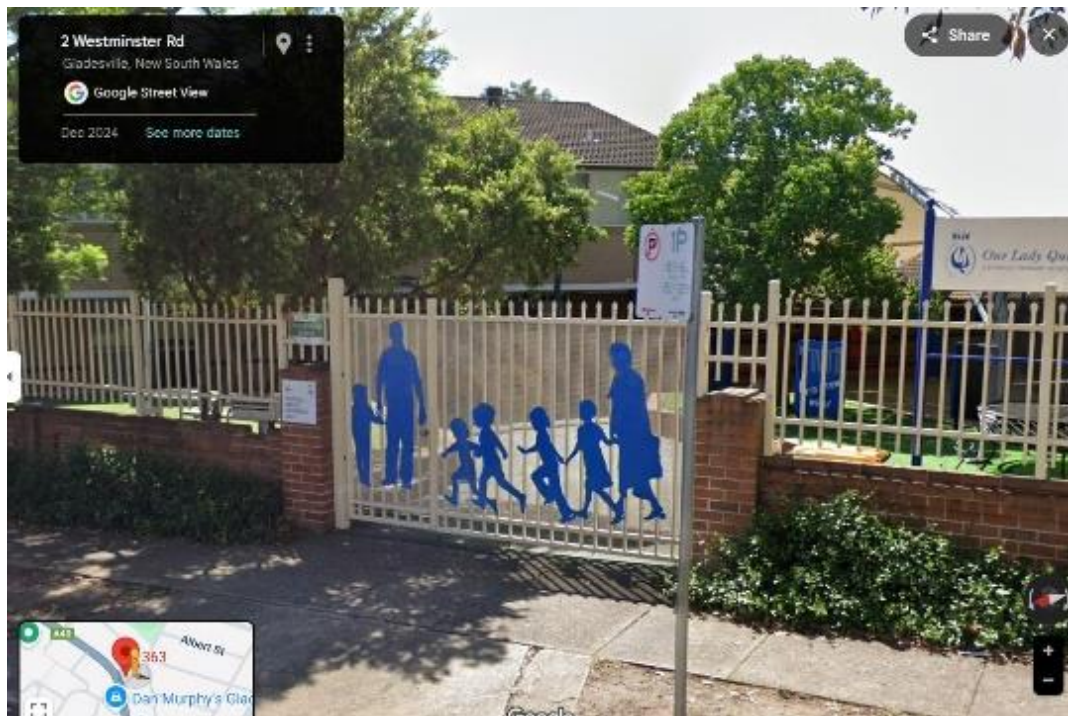


Figure 10: Extract showing school entry opposite proposed loading dock (Source:Google Maps)

The proposal can encourage a more intimate and vibrant street with raised pedestrian crossing to access the school, a small retail frontage and café. Local retail may be better located in the

short to medium term along Westminster Road than in the high speed and high-volume interface along Victoria Road.

Vehicular movements and parking

There is currently an access point along Eltham Street that services the shops along Victoria Road. This entrance is discrete and small and does not have a busy flow of vehicles.

This is potentially a good place to locate residential vehicular access depending on the volume of vehicles proposed. Eltham street is also a one-way road.

As discussed in the pedestrian access and amenity section large vehicle movements along Westminster Road will impact on the safety and amenity of school children. Large volumes of traffic from 416 spaces will also be a safety concern for children trying to access the school. As highlighted previously the school access for people walking in mainly through Westminster Road.

Has the proposal looked at commercial and loading vehicular movements to occur off Victoria Road, or possible to have a service access road from Victoria through to Eltham Street.

Wind Assessment

Due to expected wind conditions and its potential impact on the communal open space, Council requires a detailed wind assessment to be undertaken and that the EIS propose adequate wind mitigation measures particularly for the communal open space.

Drainage

On EIS submission a detailed stormwater and public domain plan is required that considers the following:

- If public domain works are undertaken to widen Westminster Road, the existing stormwater drainage infrastructure including kerb inlet pits will need to be relocated and modified to suit the new road alignment. All pits are to be positioned within the new kerb line to ensure effective surface drainage. All drainage works must be designed and constructed in accordance with Council's standards and must maintain the ongoing functionality of the stormwater system.
- Provide a drainage network capacity assessment for the proposed connection(s) to Council's stormwater system. The assessment must confirm that the receiving network has adequate capacity to accommodate the development's discharge without causing surcharge or adverse downstream impacts.
- Where the assessment identifies insufficient capacity in the downstream system, the applicant must identify and propose any necessary upgrades to support the additional flows.
- A CCTV investigation report of the downstream drainage system is required where a new connection is proposed to an existing Council asset. The report must verify the structural condition and capacity of the receiving system to ensure it is suitable for accepting the proposed discharge.
- Please see Council drainage diagram below for your reference:

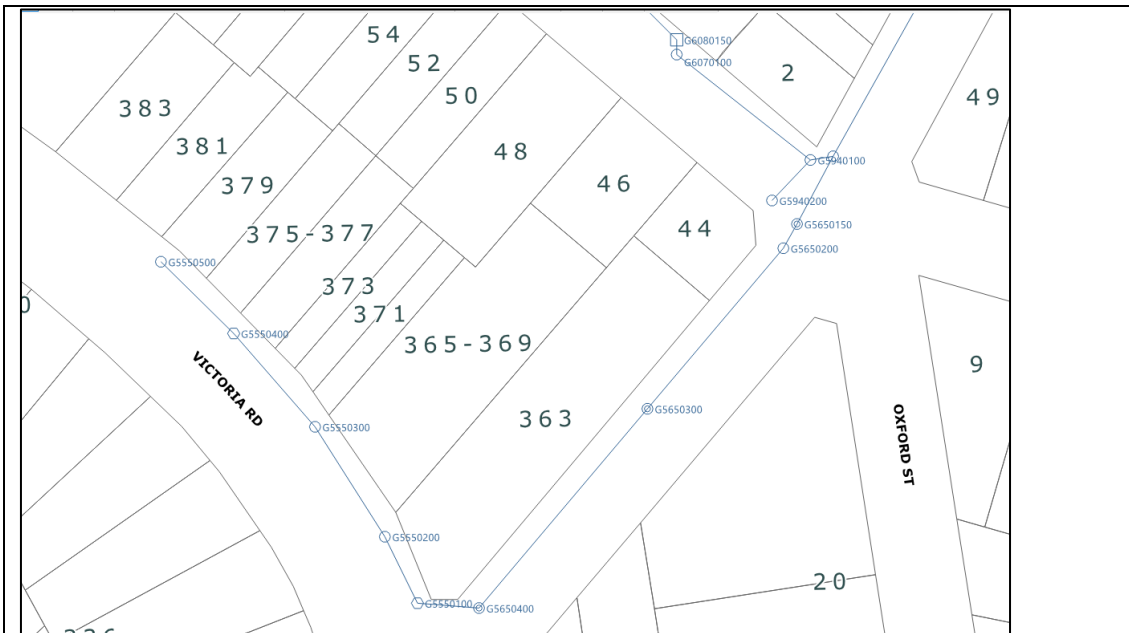


Figure 11: Extract showing Council networks (Source: Ryde Maps)

Traffic

Council has considered the applicants draft Pre-EIS package and is concerned about the developments impact on the local traffic network. The provided traffic assessment requires further revision to address Council's SEARs advice and the below advice:

- Section 3.2 of the TIA report proposes converting the eastern end of Eltham Street, between Westminster Road and the site's access driveway, from one-way to two-way traffic, with the aim of reducing vehicle movements along the full length of Eltham Street. While this change may reduce traffic volumes on the street, it would also result in the loss of on-street parking and negatively impact nearby low density residential properties.

The submitted plans do not include a turnaround area at the transition point between the one-way and two-way sections, which would be necessary to support the proposed change.

As such, Council does not support the conversion of the eastern end of Eltham Street to two-way traffic. If the applicant wishes to retain vehicular access from Eltham Street, the driveway must operate as a right-out only exit, with no changes to the existing one-way road configuration.

- The submitted documentation with the pre-lodgement application indicates that access to the proposed loading dock is to be provided via Westminster Road. It is understood that TfNSW does not support any access from Victoria Road.

However, the proposed location of the access driveway along Westminster Road is not ideal, as Our Lady Queen of Peace Catholic Primary School is located on the eastern side of the road, with one of its car park access driveways situated directly opposite the proposed loading dock access. This configuration increases the potential for conflicts between heavy vehicles and school-related traffic.

Without evidence from TfNSW that clarifies access from Victoria Road is not permitted, Council does not support any access to the site's loading dock from Westminster Road.

Council seeks that the Loading dock access must be provided from Victoria Road, while access to the basement car park is permitted from Westminster Road.

Should TfNSW not agree to loading dock access from Victoria Road, then Council seeks the EIS provide a comprehensive Loading Dock Management Plan that specifically address the following Matters (but no be limited too):

- 1) Use of Loading dock areas by all tenancies within the development
 - 2) Vehicle delivery times and schedules, noting the adjoin school zone and vehicle movements may cause safety concerns
 - 3) Number of vehicle movements per day and week
 - 4) Size of the vehicle, noting Council is concerned with 19m trunks entering the site and their impact on the local road network.
- The submitted TIA report, provided with the pre-lodgement application, does not include the results of SIDRA modelling for the nearby intersections. Without this information, it is not possible to confirm that the modelling accurately reflects the future performance of the surrounding road network. As such, the applicant will be required to update the TIA to include the relevant SIDRA modelling files for all assessed scenarios.

Additionally, Section 6.3 of the TIA report notes that no background traffic growth factor was applied in the modelling. This approach is not acceptable. The applicant must incorporate a background traffic growth rate, informed by the Strategic Transport Forecasting Model (STFM) maintained by TfNSW, and undertake additional modelling that reflects 10-year projected traffic conditions—both with and without the proposed development.

- TfNSW's response to the SEARS request (letter dated 17 April 2025, CM reference D25/70291) outlines specific modelling requirements. These include using current traffic counts; calibrating the base model against observed on-site conditions (e.g. queue lengths and delays); providing traffic volumes for existing and future scenarios with and without the development; identifying any modified default values with justification; and submitting electronic copies of the SIDRA files to TfNSW for review. It is strongly recommended that the applicant submit the updated traffic modelling to TfNSW and obtain written endorsement prior to lodging the final development application for approval.
- There are currently no right-turn opportunities for westbound traffic on Victoria Road at its intersection with Westminster Road, or at any point prior to this intersection. As a result, the only available right-turn route for westbound traffic to access the site is via a right turn onto Monash Road, followed by a right turn onto Eltham Street. This would result in approximately 50% of site-bound traffic, including heavy vehicles, being directed onto Eltham Street - a one-way local residential road. This level of additional traffic on a local street is not considered acceptable.
- To address this issue, the applicant will be required to explore alternative right-turn options for westbound traffic on Victoria Road prior to Monash Road. These may include, in consultation with TfNSW, potential upgrades to the signalised intersection at Victoria Road and Westminster Road to introduce a right-turn phase, or the installation of new traffic signals at the intersection of Victoria Road and Cambridge Street, including a right-turn phase from Victoria Road into Cambridge Street.
- It is also recommended that the following mitigation measures and upgrades be considered to address potential traffic impacts associated with the proposed development:
 - **Extension of the westbound right-turn bay** on Victoria Road at the intersection with Monash Road to accommodate increased right-turn demand generated by the development;
 - **Traffic safety and capacity improvements** at both the Monash Road/Eltham Street intersection and the Eltham Street/Westminster Road roundabout;
 - **Widening of the Westminster Road** approach at its intersection with Victoria Road to improve traffic flow;
 - **Upgrades to bus stops** along the site's Victoria Road frontage, in consultation with TfNSW, to support increased public transport usage;

- **Installation of a new pedestrian crossing** on the western side of the Victoria Road/Westminster Road intersection to improve access for future residents, visitors, and workers using bus stops on the opposite side of Victoria Road; and
- **Provision of a shared-use** path along the site's frontage on Victoria Road, also in consultation with TfNSW, to support safe pedestrian and cyclist movements.
- In addition to the above measures and upgrades, and considering the scale of the proposed development, the extent of traffic impacts, and existing local traffic conditions, the applicant is required to prepare a Local Area Traffic Management (LATM) Plan. The LATM Plan must cover Eltham Street (between Monash Road and Westminster Road), and Westminster Road (between Victoria Road and Ryde Road). The plan should include but not be limited to upgrades to the roundabout at the intersection of Westminster Road, Eltham Street, and Oxford Street, including the installation of pedestrian refuges on splitter islands and traffic calming measures along Westminster Road and Eltham Street to improve safety and manage traffic volumes. The applicant will be responsible for implementing all works identified in the approved LATM Plan.
- The submitted TIA report, provided with the pre-lodgement application, does not include swept path diagrams for vehicles accessing the site. A swept path assessment must be undertaken to demonstrate that the largest and longest vehicle expected to service the site can enter and exit via the proposed access driveway in a forward direction, without encroaching on adjoining public or private infrastructure. Reversing movements to or from the site will not be permitted.
- If the site's access to loading dock cannot be provided from Victoria Road, particular concern is retained related to the turning movements of heavy vehicles accessing the site's loading dock via Westminster Road. The submitted TIA report indicates that the largest vehicle servicing the loading dock will be a 14-metre articulated truck. Due to its size, this vehicle would need to utilise the opposing traffic lane to complete turning movements into and out of the site, which raises significant safety concerns. These concerns are heightened by the proximity of Our Lady Queen of Peace Catholic Primary School on the eastern side of Westminster Road, where high levels of pedestrian activity and school-related pick-up and drop-off movements occur.
- Section 5.1.1 of the submitted Traffic Impact Assessment (TIA) report notes that the TfNSW Urban Freight Forecasting Model (UFFM) recommends a minimum of three loading bays within the loading dock area for the proposed development. However, the architectural plans submitted with the pre-lodgement application show provision for only two loading bays. Given the anticipated high demand on the loading dock - servicing a supermarket, waste collection vehicles, and residential removalists - it is considered that a minimum of three loading bays is necessary to support the operational needs of the development. Accordingly, the applicant will be required to redesign the loading dock layout to accommodate at least three (3) loading bays.

Waste Management

On EIS submission the applicant must demonstrate the following waste requirements have been met:

- Provide vertical and horizontal swept paths for a heavy rigid vehicle (12.5 m long with a 4.5m headroom) in accordance with AS 2890.02 to ensure waste collection vehicles can safely access the site for servicing.
 - Paths must be provided for the entire path of the waste collection vehicle.
 - As the proposed loading bay will be intensely used and shared by the supermarket, paths must show how the waste collection can access and exit in a forward direction, avoiding obstruction by other delivery and loading vehicles.
- Provide a minimum 2 metres rear clearance to support efficient servicing of bulk bins.
- Amend waste generation rates for as your site will require:
 - 8 x 1100 litre waste bins collected 3 times a week
 - 17 x 660 litre recycling bins collected 2 times a week

- 2 x 240 litre garden organics bins collected fortnightly
- 16 metres squared minimum of unobstructed bulky waste storage space

The Applicant must demonstrate suitable storage for 18 x 240 litre food organics bins in anticipation of a Food Organics Garden Organics (FOGO) service. This will ensure organic waste is considered in the provision of bin allocation and space for bin storage.

- Reposition the main waste storage area to ensure the doorway opens directly onto the loading bay to support efficient servicing.
 - Bulky waste and bin storage areas must open directly onto the loading area for servicing.
 - Bulk waste can not be ferried between waste rooms or stored without direct access from the rear of the waste collection vehicle. As currently proposed, the bulky waste would have to be left out in the loading dock which is not supported as it creates a hazard.
- Provide space for a future mobile food organics bin in each chute room for the deposit of organic material.
- Provide suitable space in the loading area for the servicing of the required number of commercial bins for the proposed Café
 - Currently, collection is proposed off Victoria Road which is not supported. Bulk bins presented at the kerbside impact local amenity, impact footpath availability, detract from active street frontages and create sightline issues. This is emphasised by the proximity to a corner.
- Provide a minimum 5 square metres for the storage of bulky items from the supermarket to reduce potential illegal dumping.
- Provide an updated waste management plan which reflects the required changes. It must also specify:
 - Commercial waste generation rates consistent with the NSW EPA Better Practice Guide for Resource Recovery in Residential Developments 2019
 - This must be specified for Café and Supermarket, clearly outlining where the rates come from and how they have been applied
 - Loading dock access and potential boom gates, lockboxes or shutters.
 - That Council does not offer waste collection windows. Residential waste may be collected anytime between 5AM to 3PM.

Public Domain

The applicant is to adopt City of Ryde DCP 2014- Gladesville Town Centre and Victoria Road Corridor and Public Domain Technical Manual for Gladesville Town Centre in their design documents for public domain. Public domain works include the following:

- Undergrounding of services and cables are required for the Victoria and Westminster Road's frontages.
- Multi-function poles are to be installed along the Victoria Road frontage.
- Bus Stop needs to be reconstructed at Victoria Road frontage to ensure DDA compliance
- Granite paving footpath is to be installed at the frontage of Victoria and Westminster Road.
- Street trees are to be placed at the Victoria and Westminster Road frontages.
- Subject to turning path analysis/swept paths of MRVs/HRVs, Kerb and footpath alignments are to be adjusted at Victoria Road and Westminster Road to suit turning path largest vehicles used.
- Layout of the vehicular crossings are subject to swept path analysis.

Vehicle access and Accommodation

The proposed service vehicle access appears inadequate with respect to vehicle maneuverability, placing a considerable proportion of the maneuvering over footpath areas. Considering the location of the site in proximity to a public school opposite and the anticipated

volumes of pedestrian traffic during school pick up and drop off times, the arrangement presents a considerable safety concern.

Further to this, the arrangement may also impose or cause vehicle queuing arising from vehicles entering Westminster Road from Victoria Road and having to slow or stop in the event that a service is having to perform a multipoint turn entering the site or such. It is strongly suggested that the service vehicle access to the loading bay area be designed to ensure the safe and efficient access could be provided for service vehicles.

Affordable housing distribution and Amenity

Council notes that the application seeks to provide 5% affordable housing for a 15-year period, however, is not seeking to utilise the incentive infill provisions of the Housing SEPP. The 5% affordable housing is supported in principle, however as the application is seeking a significant uplift, a timed period for affordable housing is not supported.

Council seeks that consistent with Council's affordable housing policy that the affordable housing proposed is provided in perpetuity. This affordable housing can either be dedicated to Council or maintained by a community housing provider in perpetuity. Details of the affordable housing are to be provided on EIS Submission.

Amenity

Council supports the provision of affordable housing and recognized its value, however recently Council has been subject to complaints and inquiries from occupants of these approved social housing developments requesting Council considers the amenity afforded to these units as these occupants are suffering from the poor living conditions by virtue of inferior design outcomes.

Council has seen that these units are provided the least amount of amenity in the entire block and are subject to significant impacts. Simply allocating the most amenity impacted units within a complex to be used as affordable housing as its "affordable" isn't supported. Occupants of the affordable housing should be afforded the same rights and respect as others in an equitable manner.

A suitable range of affordable units that are balanced throughout the tower and are afforded a reasonable amount of amenity is required. At minimum the affordable housing units should be evenly spread throughout the complex (across multiple levels of the building) and that each of these units have sufficient access to solar and ventilation complying with one or both requirements under the ADG.

It's recommended that:

- Affordable housing units are evenly spread throughout the building (multiple levels)
- A reasonable amount of affordable housing units achieves compliant solar access and natural ventilation with these units at minimum complying with one or both of the ADG solar and ventilation requirements.

OUTCOMES and SSDA Lodgement Requirements

Council thanks the Applicant for engaging early on the design and the outcomes proposed on the site. Council appreciates early engagements on State Significant Applications. This advice contains technical advice on detailed application matters that will assist the Applicant in preparing their EIS.

The advice contained within this report should be considered in conjunction with the issued SEARs for the development. Council recommends that any EIS submitted consider this advice and amend the design/ provide evidence with the EIS to address these issues.

Council thanks you for choosing to engage with us for formal Pre-Environmental Impact Statement Advice.

If you require any additional information regarding this matter, please contact Nic Najar- Acting Senior Co-Ordinator Development Advisory Service on 0403 215 603 or email to NicholasNa@ryde.nsw.gov.au

Yours sincerely

Nicholas Najar
Acting Senior Co-Ordinator
Development Advisory Services.

End of advice