City of Ryde

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Department of Planning, Housing and Infrastructure
Email: emma.butcher@dpie.nsw.gov.au

3 February 2026

Our Ref: COR2026/162

Attn: Emma Butcher

Dear Emma,

Request for SEARs – 744 & 748 Victoria Road and 2A Eagle Street, Ryde

Thank you for the opportunity to comment on the Secretary's Environmental Assessment Requirements (SEARs) for the proposed development at 744 & 748 Victoria Road and 2A Eagle Street, Ryde.

A list of deliverables is included in **Part 1** which is to be read in conjunction to the Specific Department Comments under **Part 2**.

Council requests that the requirements as outlined in the attached response are included in the SEARs.

Council reiterates the importance of quality and considered consultation with stakeholders including City of Ryde Council. The applicant is advised that they should undertake detailed engagement with Council on numerous aspects of the proposal prior to the submission of the Environmental Impact Statement (EIS). City of Ryde Council offers a paid pre-lodgement service that will apply to any engagement the applicant seeks to engage with Council on.

If you require any additional information regarding this matter, please contact David Rohloff, Manager Development Advisory Service on 0468627502 or email to davidroh@ryde.nsw.gov.au

Yours sincerely

Kandace Lindeberg
Director Development and Regulation

RESPONSE TO SEARs REQUEST - CITY of RYDE

Project: State Significant Development Application (SSD-104098721) for the rezoning of the site to accommodate a mixed-use shop-top housing development

Location: 744&748 Victoria Road and 2A Eagle Street , Ryde

Applicant: Cadence Property Developments Pty Ltd

Council Reference: COR2026/162

The City of Ryde requests that the following matters be addressed/included, in addition to the standard SEARs requirements. It is noted that another SSD project (SSD-80441960) is due to be lodged at the Club Ryde site located at 724-730 Victoria Road, Ryde, which is in very close proximity to the subject applications. All impacts should be considered in a cumulative manner:

Part 1 – Deliverables

1.0 Voluntary Planning Agreement (VPA) and Contributions

Identification of Infrastructure Demands

The proposed development significantly exceeds the infrastructure demand anticipated under the existing planning framework and adopted contributions plans. In particular, the proposed floor space ratio (FSR) of 7.8:1 represents an increase of approximately 420% over the current maximum control of 1.5:1, along with the exceedance in height of building (HOB) of an unspecified amount. The application must identify and address the anticipated local infrastructure demands arising from the proposal. This assessment should reference Council's Local Infrastructure Strategy and Open Space Future Provisions Strategy to ensure the consideration of cumulative infrastructure impacts and alignment with strategic planning objectives.

Addressing Infrastructure Shortfalls

Given the scale and intensity of the proposed development, and the size and configuration of the site, it is expected that the required infrastructure demands cannot be addressed via the direct delivery of infrastructure on the site. It is expected that the application be accompanied by a Voluntary Planning Agreement (VPA) to mitigate the additional infrastructure demand generated by the proposal. Potential public benefits under a VPA may include, but are not limited to:

- Direct delivery of transport and traffic infrastructure works;
- Dedication of affordable housing (AH) in perpetuity;
- Monetary contributions toward open space embellishment or other identified infrastructure priorities.

The proposal indicates that 15% infill affordable housing is intended to be provided within the residential tower. Council notes that, for the purposes of assessing public benefit, only the dedication of affordable housing dwellings in perpetuity, or the payment of an equivalent monetary contribution, is considered an appropriate benchmark.

Early and transparent engagement with Council regarding the potential VPA is strongly encouraged prior to submission of the Environmental Impact Statement (EIS). This approach will assist in avoiding delays during assessment and enable timely input from Council's infrastructure planning team.

Required Report/Outcome

- The application must identify the anticipated infrastructure demands generated by the proposal and detail how these demands will be addressed through an infrastructure demand analysis.
- A planning agreement may be required to address the anticipated infrastructure demands of the proposal. Consultation should occur directly with the Council and is encouraged to commence ahead of any EIS being submitted.
- A draft letter of offer is to be submitted with the EIS.

2.0 General Documentation/Deliverables Requirements

2.1 Rezoning

- Rezoning Report, which demonstrates consistency with the vision and objectives of the Ryde Integrated Transport Strategy and assesses the strategic merit for the site.
- Economic and Social Impact and Needs Assessment Report.
- Includes a Whole-of-Site Masterplan that addresses:
  - Site setbacks.
  - Building heights.
  - GFA allocation.
  - Deep soil allocation and location.
  - Open space allocation and location.
  - Vehicle access/egress points.
  - Waste removal and access

2.2 Development of the Site

2.2.1 Plans

Council requires the following plans to be submitted as part of the EIS package.

Plan Type	Details Required
Architectural Plans (scaled and dimensioned)	○ Schedule Tables of key numeric features to include: ▪ Gross Floor Area (and Floor Space Ratio) to be broken down to: • Residential GFA. • Retail/Commercial GFA. ▪ Car parking (per basement level and total). ▪ Storage provision (basement and apartment). ▪ Apartment Mix. ○ Section Plans to intersect through the highest points of the development relative to existing ground level (referencing the extrapolated ground level method (*Bettar v Council of*

	the City of Sydney, [2014] NSWLEC 1070) and existing ground level method (*Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582*). o Site Analysis to include impact on surrounding area. o Building Separation Plans in response to the Apartment Design Guide (ADG). o Shadow Diagrams to show shadows cast hourly between 9.00am and 3.00pm on 21 July. o View from the Sun diagrams depicting hourly sunlight access between 9.00am and 3.00pm on 21 July. o Height Plane Diagrams. o Gross Floor Area (GFA) plans (to include numeric provision). o Deep Soil Area plans (to include numeric provision). o Communal Open Space area plans (to include numeric provision). o Solar Access Plans (internal) (to include numeric provision). o Cross Ventilation Plans (internal) (to include numeric provision). o Bulk Excavation Plan. o Schedule of Materials and Finishes.
Landscape Plans (prepared by a qualified Landscape Architect)	o Landscape Plan o An Arboricultural Impact Assessment (AIA) is required of trees on site and on adjoining sites impacted by the development. This will include the pocket park at the corner of Victoria and Devlin Street. The AIA must comply with Australian Standard AS4970-2025 protection of trees on development sites. o The Apartment Design Guide requires 7% of the site to be deep soil area. o As required by City of Ryde DCP Part 9.5 Tree Preservation 2025, council will require replacement tree of minimum 75 litres to be planted at a rate of 3:1 for any tree approved for removal.
Civic Plans (Public Domain)	o Concept Plan showing arrangement of public domain upgrade works fronting the site and connecting with existing adjoining public domain infrastructure. o Location/s and details of vehicular crossings. Design of vehicular crossings are to be as per Council DCP and relevant Australian Standards. o Swept path analysis used for the largest vehicle used for the development. o Building access levels from footpath at public domain. o Landscape plans and arborist report showing the impact of existing trees at public domain due to the development. o Survey plans showing the location of existing infrastructures such as pram ramp, council lintel pits

	roundabout, traffic signals and median islands. Surveys should also include levels for boundary, existing road and kerb and gutter.
Stormwater Drainage Plans	○ Detailed stormwater management plan to be prepared and indicate the method of site drainage. ○ Details of the connection to Council pipe shall be included in the Stormwater Management Plan. ○ Drainage network capacity analysis must be demonstrated to ensure the proposed development can be effectively drained and managed via the downstream drainage network. ○ Identification of any upgrades to existing drainage system required to support the proposed development.
Stormwater Engineering Plans	○ A concept Stormwater Management Plan prepared by a suitably qualified Stormwater Engineer and designed in accordance with the DCP Part 8.2 (Stormwater and Floodplain Management). ○ Clarification on the point of discharge and depict all hardstand areas, downpipes, and discharge lines and required components such as rainwater tanks / OSD systems, absorption trench details, etc.
Boundary identification Survey Diagram	○ Boundary locations and dimensions. ○ Spot levels. ○ Easements.
Signage Plans	If signage is proposed
Subdivision Plans	Include stratum plans, if relevant

2.2.2 Supporting Documentation

In order for a fully informed assessment to take place, council requires the following documents to be submitted as part of the EIS package:

- Compliance tables of the proposal against the ADG and Ryde Development Control plan 2014.
- Estimated Cost of Development prepared by a qualified Quantity Surveyor.
- Urban Design Study (including massing studies undertaken prior to the preferred option).
- BASIX Certificate(s) and NaTHERS Certificates.
- Details of staging of development and subsequent approval pathways for future applications.
- Design Verification Statement/Design Report.
- Arboricultural Impact Assessment (AIA).
- Visual Impact Assessment and photomontages taken from key vantage points (refer also to Section 13 for Council's minimum visualisation expectations).
- Acoustic Report (noise and vibration), noting the construction noise and vibration impacts on nearby residences) and adjoining trainline.

- Traffic and Parking Impact Assessment (TPIA) report prepared by a qualified traffic engineer in accordance with TfNSW's Guide to Transport Impact Assessment (2024), addressing (at minimum) the matters set out in Section 4 (Traffic), including network modelling, swept paths, parking supply, servicing arrangements and active transport measures.
- Pedestrian Wind Impact Assessment report.
- Access report.
- Air Quality Impact Assessment, including cumulative impact during construction and any proposed mitigation measures.
- Preliminary Site Investigation (PSI) and any subsequent contamination reports stemming from the results of the PSI.
- Stormwater strategy and flood precinct study (including Water Sensitive Urban Design), consistent with Sections 2.2.1 (plans) and 16 (Flooding).
- Economic Impact Analysis detailing impact of the retail/commercial components of the development on local centres within 5km, the quantum of employment floor space and likely employment generation.
- Sustainability Management Plan or Environmentally Sustainable Development (ESD) report.
- Geotechnical Assessment report prepared by a qualified Geotechnical Engineer.
- Construction Management Plan.
- Utilities and Infrastructure Assessment.
- Net Zero Statement.
- Crime Prevention Through Environmental Design (CPTED) Assessment.
- Public Arts Plan.
- Waste Management Plans covering demolition, construction and operational phases.

Part 2 – Supplement Commentary

3.0 Specific Department Comments

Part 2 provides supplementary/explanatory commentary and defines Council's minimum assessment expectations for the deliverables listed in Part 1. The following provides supplementary/explanatory comments from Council departments to items included in the above list. Part 2 is to be read as the authoritative scope definition.

4. Traffic

(1) The applicant is required to submit a Traffic and Parking Impact Assessment (TPIA) report prepared by a qualified traffic engineer in accordance with the requirements of the TfNSW's *Guide to Transport Impact Assessment (2024)* to accompany the Development Application associated with the proposal. The TPIA is required to address/cover (at minimum) the following items:

- Assesses the existing traffic conditions within the surrounding road network affected by the proposed development. This assessment needs to be based on weekday morning and afternoon peak hour traffic surveys in recent time between 7:00am – 9:00am and 4:00pm – 6:00pm at the following intersections:
  - Eagle Street and Gladstone Avenue;
  - Gladstone Avenue and Cowell Street;
  - Cowell Street and Princes Street;
  - Princes Street and Victoria Road;
  - Morrison Road and Gladstone Avenue;
  - Morrison Road and Princes Street; and
  - Morrison Road and Church Street.
- Provides a SIDRA traffic modelling assessment of the following scenarios:
  - Existing Conditions;
  - Existing + Post-Development Conditions; and
  - 10-year projected traffic conditions (with and without the development traffic), which incorporates background traffic growth for Macquarie Park established within Transport for NSW's Strategic Traffic Forecasting Model (STFM).
- Recommends appropriate ameliorative measures to minimise the impact of the proposed development on traffic safety and efficiency within the surrounding public road network that are to be delivered by the applicant. These measures can comprise of active transport improvements to encourage greater walk and cycle trips as a means to reduce traffic generated by the proposed development.
- Ensures the vehicular access, off-street parking and heavy vehicle servicing arrangements are designed to comply with the following:
  - The Australian Standard for Parking Facilities Part 1: Off-Street Parking (AS 2890.1);
  - The Australian Standard for Parking Facilities Part 2: Off-Street Commercial Vehicle Facilities (AS2890.2);
  - The Australian Standard for Parking Facilities Part 3: Bicycle Parking Facilities (AS2890.3);
  - The Australian Standard for Parking Facilities Part 6: Off-Street Parking for People with Disabilities (AS2890.6); and
  - Ryde City Council's Development Control Plan
- Provides a swept path assessment which shall be undertaken to demonstrate that the largest/longest vehicle to be serviced on site is capable of accessing and vacating the site via the proposed access driveway in a forward direction without any encroachment on adjoining public and private infrastructure. Additional swept

path plans are to be provided to demonstrate that largest/longest vehicle can turn at the critical nearby intersections without encroaching on the opposing lanes.

(2) The Lower Ground Floor Indicative Floor Plan within the SSD Scoping Report (Figure 4) shows that two separate vehicular driveways beside each other are proposed to provide access to the basement car park and the loading dock. To minimise the length of crossover along Eagle Street, it is recommended that the access arrangements be revised so that a single vehicular driveway is provided, with access to the basement car park and the loading dock separated within the site boundary.

(3) The TPIA is required to include details of the minimum number of loading bays for the proposed development, determined in accordance with Transport for NSW's Urban Freight Forecasting Model (UFFM). In addition, the architectural plans must demonstrate that the proposed loading dock can accommodate the required number of loading bays as identified by the UFFM assessment.

5 Waste Management

Council requires the following information to be include as part of the EIS package in order to make a fully informed assessment. In addition to the below, it is noted that as a turntable has been proposed, council will seek an alternative method to ensure bins are collected in the event of a system fault or failure to maintain. The method may include a generator, manual crank, and/or alternative service access. The purpose of this alternative is to ensure continuity of essential waste services which are provided 5 times per week for the life time of the development. Additionally, as standard practice, council will seek to impose a covenant in relation to the management and maintenance of the turntable.:

- Provide a waste management plan prepared by a suitably qualified professional which details the demolition, construction and ongoing waste management requirements. Operational requirements are to detail how waste will be managed onsite, including generation, storage, collection and maintenance.
    - Note, Council does not permit the use of private waste contractors for domestically rated residential units.
- Provide a minimum 4.5 metre headroom clearance for a heavy rigid vehicle in accordance with AS 2890.2 to support access for Council's waste collection vehicles. The clearance must be provided along the vehicles entire travel path and be free of obstructions including pipes, sprinklers, eaves and overhang.
- Provide swept paths for a heavy rigid vehicle in accordance with AS 2890.02 to ensure waste collection vehicles can safely access the site for servicing.
- Provide a minimum 2 metres rear clearance to waste collection vehicles to support efficient servicing of bulk bins.
- Ensure the loading dock design to enables the waste collection vehicle to enter and exit the site in a forward direction. Council doesn't support waste collection vehicles reversing across footpaths and high traffic areas.
- Provide separate waste storage areas for residential units and ensure bins are not shared with co-living uses. Each waste storage must accommodate the required number of bins with additional space for bin rotation
- Ensure all chute discharge, bulky waste and bin storage room doorways are a minimum 1.5m wide to support the servicing and rotation of bins
- Provide the require number of bins for the site consistent with:
    - 120L of waste per unit collected thrice weekly in 1100 litre bins
    - 120L of recycling per unit collected twice weekly in 660 litre bins

    - 25L per unit of food organics collected in 240 litre bins
- Provide chutes on each residential level for the efficient disposal of household garbage and recyclables. Two (2) separate hoppers must be provided as Council does not support the use of e-diverters.
    - Chutes must not be shared between the residential and co-living. Waste must be separated based on the different uses.
- Provide separate bulky waste storage areas for the residential and co-living uses for the storage or large unwanted goods. The site will require:
    - 16m2 for the 160 residential units
    - 8m2 for the 60 co-living units
- Ensure the bin travel path doesn't exceed a gradient of 1:14 and 10 metres. Excessive distance requires the use of a bin movement aid (e.g. tug and trailer). Equipment must be stored beside the waste collection area.
- Position the main waste storage area and bulky waste storage rooms in a manner that ensures the doorway opens directly onto the loading bay to support efficient servicing.

6 Public Domain

- The site is located in the Ryde Town Centre and is therefore subject to the requirements of the Ryde Town Centre Public Domain Technical Manual. The following works should be captured within a public domain concept plan, showing the scope and arrangement of public domain upgrade works along the site frontages:
    - Upgrade of Council road pavement assets.
    - Upgrade to footways - full width coloured concrete with rosa red coloured granite paver banding.
    - Undergrounding of overhead utilities along the site's Victoria Road frontage. Upgrade of concrete footpath along the Eagle Street frontage.
    - Installation or upgrade of street lighting assets.
    - Upgrade to pedestrian infrastructure such as pedestrian kerb ramps.
    - Provision of street furniture such as garbage bins, bike loops ect.
    - Upgrade of stormwater infrastructure to facilitate the development and adjoining public domain areas.
    - Adjustment, relocation or lowering of subsurface utility assets as required to facilitate the new development and adjoining public domain upgrade works.
    - Installation of street trees in tree pits and where specified in strata vault systems to facilitate the ongoing health of street trees.
    - Installation of any signage, linemarking or traffic calming devices necessary to provide for adequate vehicular and pedestrian access to/ from and bypassing the site frontages.
- Finer details of the public domain works will be resolved via the submission and review of a detailed public domain works plan, to be approved by council under the Roads Act, prior to the issue of the relevant Construction Certificate. The concept plan needs to only show the arrangement and scope of works to identify any issues or clashes.
- Any works impacting the Victoria Road carriageway or associated assets administered by TfNSW, or impacting traffic flow along Victoria Road will require TfNSW review and approval. This includes kerb and gutter, stormwater management installations, signage and line marking along the Victoria Road frontage.

8 Engineering

8.1 Vehicle Access and Parking

The parking area is to be designed in accordance with AS2890.1 with the general objectives of providing safe and efficient access to offstreet parking, with minimal imposition on the public domain.

With respect to service vehicle access, the development is of a scale which warrants that the servicing needs of occupants be wholly accommodated on site. This will warrant an internal loading bay area with sufficient service bays to accommodate the resident needs, both in terms of deliveries, removalist vans, etc and waste service vehicles. Service vehicles must achieve a forward entry and exit, thereby requiring an internal manoeuvring area.

9 Environmental Health

9.1 Contamination

Given the previous uses of the site, a detailed Site investigation (DSI) is required to be provided. Depending on the outcomes of the DSI, a remediation action plan may be required. The applicant should follow the steps as outlined in *Managing Land Contamination – Planning Guidelines – SEPP55 Remediation of Land* (DUAP/EPA, 1998).

10 Strategic Planning

10.1 Merit Assessment

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.

11 Affordable housing

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.

12 Urban Design

Council seeks that the design demonstrates design excellence qualities. It is recommended that the design be reviewed by the NSW State Design Review Panel (SDRP) for independent design advice.

Council recommends that the following matters be addressed in the EIS:

Strategic rationale and justification - A clear and robust strategic rationale is required to justify the proposed increases in building height, density, and FSR. The site is not located within an identified LMR zone and is not within walking distance of a train station, which further emphasises the need for strong justification.

Response to surrounding character - The proposal should demonstrate how it responds to the immediate low-rise residential context. Given the site's location at the edge of the town centre, the development must provide an appropriate built-form transition between higher-density commercial uses and surrounding residential areas.

Site constraints and access to transport - As the site is not within walking distance—nor within 800m—of a train station and is separated from the town centre by the highway-scale environment of Victoria Road and Devlin Street, further consideration is required. Locating families and children adjacent to a major arterial road with high traffic volumes and speeds presents significant impacts on residential amenity and overall quality of life.

Co-living justification - Further justification is required for the proposed co-living units. These housing types typically serve residents who rely heavily on public transport (e.g., students, seniors). The site's limited public transport access and constrained pedestrian safety make its suitability for co-living questionable.

Noise and air-quality mitigation - Residential development along Victoria Road must incorporate adequate buffers and mitigation measures to address noise, vibration, and air-quality impacts caused by the arterial road environment.

Wind impacts - A wind assessment is required to evaluate potential impacts on surrounding streets and any proposed podium-level communal areas.

Heritage - A heritage assessment should be provided.

13 Visual impact Assessment and Photomontages

A detailed Visual Impact Assessment (VIA) that includes photomontages from various aspects of the surrounding locality should be provided with the application. To provide photorealistic visualisation in both 'before' and 'after' scenarios at eye height from a number of critical vantage points. The VIA must also consider the impacts upon nearby heritage items.

15 Sustainability and Resilience

The Applicant will need to demonstrate the application of Environmentally Sustainable Development Principles within the development of the site.

Information should be provided on any green building/ sustainability plans or at a minimum (BASIX/ Nabers/ Nathers) assessment. (It is encouraged that a development of this size would be aiming for Greenstar compliance and certification at a minimum).

16 Flooding:

Although the site is not mapped as flood liable, there is a low point in Victoria Road and the design should allow for overland flow in the event of pit blockage or capacity exceedance, with no adverse impacts on the down stream properties

A Stormwater Management Plan is to be prepared and include:

- The proposed method of stormwater drainage for the site, including details of the internal drainage design and the nominated connection point to Council's drainage system.
- All existing Council drainage infrastructure is to be clearly identified on the plan, with the exact location of assets verified using non-destructive investigation methods.
- Existing drainage easements and Rights-to-Drain are to be identified and verified, including confirmation that the proposed works are consistent with those legal arrangements.
- Details of any proposed connection to Council drainage infrastructure.
- The Council drainage easement must be kept clear of any encroachments, including buildings, eaves, gutters, downpipes, aluminium decoration, and any other permanent elements.
- A minimum horizontal clearance of 1.0 m is required between the edge of the Council drainage pipe and all development works.

End Submission