

Daniel Keary  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

7 July 2014

Our ref: D14/55461

Dear Mr. Keary,

*Dan*

**State Significant Development Application – Station Site South and Station Site North**

I refer the above State Significant Development Application (SSDA) which has been provided to Council for comment.

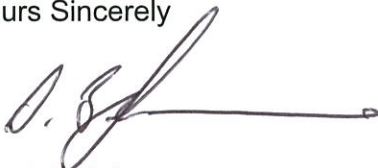
Council has reviewed the application and has significant concerns. Council initially objected to the North Ryde Station Precinct on the basis of density, height, inadequate infrastructure and impacts upon the local community. Notwithstanding Council's objection, the then Department of Planning and Infrastructure approved the application in September 2013.

The North Ryde Station Precinct is subject to a site specific Development Control Plan (DCP) which provides significant guidance for how the precinct is to be developed. In this regard, it is noted that the proposal fails to demonstrate compliance with the DCP. This is of significant concern to Council as the North Ryde Station Precinct and the associated DCP has only recently been approved, with this application being the first tested against the DCP. This may set a precedent for all subsequent Development Applications that will be assessed by Council.

Notwithstanding the proposed non-compliance with the DCP, critical areas of concern for council include the width and layout of the proposed roads, movement of cyclists and pedestrians through the site, and ensuring a holistic approach to the delivery of the road network by multiple individual parties. This is detailed further in the attached submission.

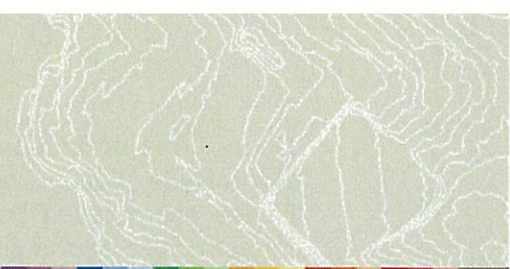
Should you wish to discuss this matter further, please contact Council's Adrian Melo, Planning Proposal Co-ordinator on 9952 8238 or via email at [amelo@ryde.nsw.gov.au](mailto:amelo@ryde.nsw.gov.au).

Yours Sincerely



Dominic Johnson  
Group Manager, Environment and Planning





# North Ryde Station Precinct

## Station North and Station South Site - State Significant Development Application



Council has reviewed the State Significant Development Application (SSDA) for the North Ryde Station Precinct in light of the Director Generals Requirements. Council's issues are detailed below. It is noted that the proposal only seeks the delivery of infrastructure on the site and does not look to amend any planning controls. It should be noted that Council is in receipt of a Development Application for 27-37 Delhi Road which is currently under assessment.

Council's concerns include but are not limited to following matters:

- The proposed roads fail to comply with the North Ryde Station Precinct Development Control Plan 2013,
- Potential lack of cohesion between the public domain and remainder of Road 38 to be delivered under the DA for 27-37 Delhi Road,
- The delivery of the intersection of Road 38 North, Road 38 South, and Station Street and Trinity Road link (Road 18), and
- The allocation of floor space to Lot 1 in exceedance of the applicable Floor Space Ratio controls.

These matters are further detailed below.

## Allocation of Gross Floor Area

In considering the proposed allocation of Gross Floor Area (GFA) to the Station Site North (Lot 1) of 29,900m<sup>2</sup> it is noted that the current Floor Space Ratio that applies to the subject site is 2.3:1. For the proposed Lot 1, this would normally deliver a total of 26,024.5m<sup>2</sup>. The additional floor space delivered under the proposed allocation would be 3,875.5m<sup>2</sup>. In Council's opinion the strict application of Ryde Local Environmental Plan 2010 to the subject site would not allow the allocation of the additional floor space to the subject site. This is as the total GFA is determined on a case by case basis by what is proposed at time of assessment. This Development Application (DA) does not seek construction for any buildings but only infrastructure.

It is unclear from the finalisation report and studies supporting the North Ryde Station Precinct (NRSP) whether the Departments original intent was for the FSR to be inclusive or exclusive of the roads proposed. With regards to this site, it is noted that the Parsons Brinckerhoff, *North Ryde Station Precinct Project - Transport Management and Accessibility Plan*, November 2012 (p. 13) provides an indicative yield of the subject site of 38,400m<sup>2</sup>. Whilst Council previously raised concerns regarding the TMAP, it is noted that it has since been supported by the Department of Planning and Environment. The proposed GFA does not exceed the envisaged GFA but does propose alternate uses. The supporting documentation accompanying the SSDA has demonstrated that a reduced traffic generation is anticipated as a result of this change in uses.

However, this does not allow for any consideration of appropriateness of the resultant built form. Should the proponent continue to seek the additional GFA allocation, it is recommended that further modelling of the potential building envelopes be detailed to demonstrate that this will result in a reasonable outcome for the site. These envelopes must demonstrate that there is no additional increase in building height.

It is unclear whether the allocation of GFA to Lot 1 would be exclusive of any potential GFA to be allocated to Lots 1, 2 and 3 in DP 1131774. It is also unclear as to how this GFA will be allocated in perpetuity against the subject properties once created. It is also unclear whether this GFA allocation will need to be amended in the

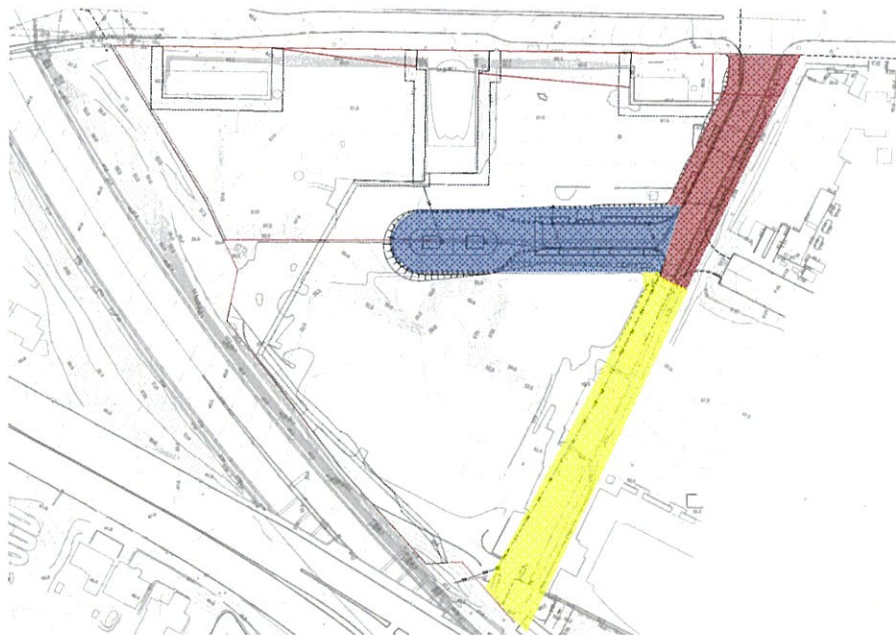
event that Council does not support the dedication of Station Street and Road 38 to Council as a public road.

## Transport and accessibility

In considering any proposed road design and layout it must be recognised that the NRSP has always been envisaged as a Transit Orientated Development (TOD). The Parsons Brinckerhoff, *North Ryde Station Precinct Project - Transport Management and Accessibility Plan*, November 2012 supporting the NRSP identifies that the precinct is a TOD as it allows for:

- *prioritisation of pedestrian and cycle activity and proximity to high quality bus and rail facilities and services*
- *reduced levels of private vehicle parking combined with provision for car share schemes and other transport alternatives to reduce car dependency*
- *liveable and active public domain spaces for the community that integrate with proposed land uses and the station, (pp 7-8)*

The SSDA includes the delivery of 2 roads. These roads include Station Street (shown in blue below) and Road 38. Road 38 extends from Delhi Road through to Lucknow Road, with only Road 38 North (shown in red below) being delivered under the SSDA. Notwithstanding this, Council is in receipt of a DA for 27-37 Delhi Road which includes Road 38 South (shown in yellow below).



Council does not support the proposed road design. This is as the proposed widths fail to comply with that shown within the North Ryde Station Precinct Development Control Plan 2013 (NRSP DCP 2013). Council's position is that the widths detailed within the NRSP DCP 2013 should be provided. Further detail regarding each road is provided in the following sections.

## General Matters

Whilst Road 38 South does not form part of the SSDA, care must be taken that Road 38 North and South are dealt with in a holistic manner. This can be ensured through the consistent application of the requirements of the DCP 2013. It should be noted that the intersection of Station Street and Road 38 is also expected to link with

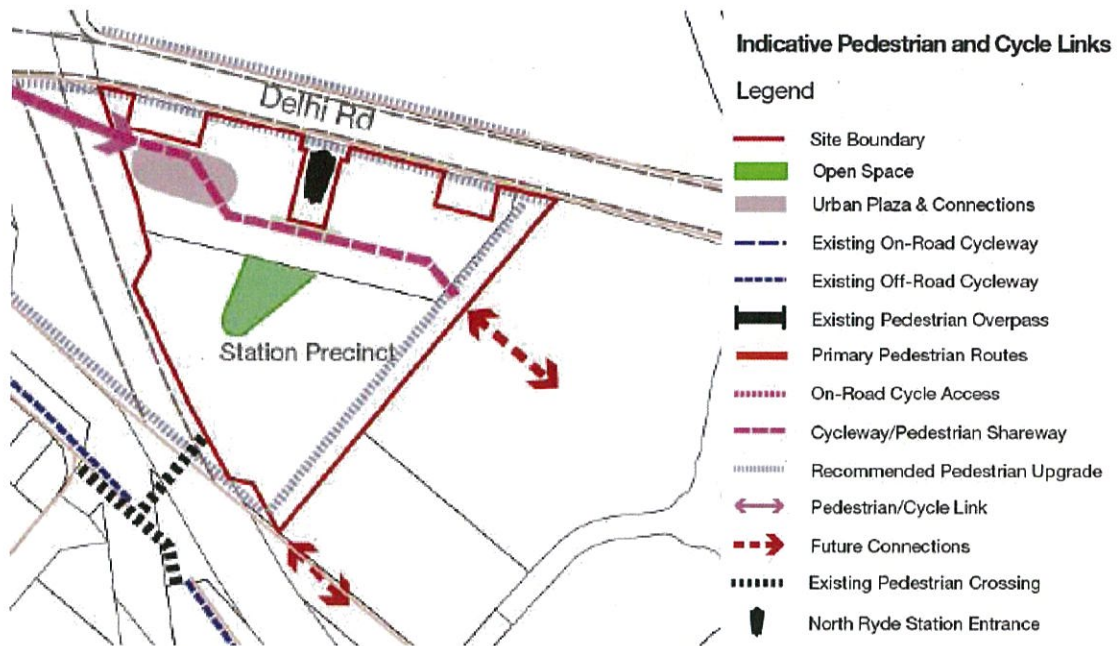
Trinity Road located on 39 Delhi Road. Trinity Road has been subject to several previous DAs, with the most recent being LDA2012/0306 (approved 6 December 2012 but modified 15 August 2013) involving subdivision of 39 Delhi Road and the construction and dedication of the Trinity Road link (Road 18) to Council. No detailed design of the road has been undertaken to date. It should be noted that the application is limited to the existing property boundaries and does not affect land covered by the SSDA. As such, the provision of Road 38 and its connection to Road 18 must be carefully coordinated and as part of the SSDA. A copy of the approved plan for 39 Delhi Road is attached. It should be noted that to date no subdivision certificate has been lodged.

Given that the intersection of Road 38 North, Road 38 South, Road 18, and Station Street will be delivered by 3 individual parties (UGNSW, applicant for 27-37 Delhi Road, and adjoining property owners) care must be taken to ensure that all levels are accurate and that the intersection will function. Accordingly, Council is of the opinion that the SSDA should include details demonstrating that the proposed Road 38 North, Station Street and Road 18 are capable of connecting. In this respect it is noted that the SSDA and supporting Transport Impact Assessment has identified that the Road 18 is to be left turn into Road 38 only. It is unclear whether the approved road boundary provides for this turning arrangement. This also supposes that the property owner of 39 Delhi Road will be capable or willing to limit this road to left only.

With regards to public domain for all proposed roads, it is noted that Multi-Function Poles (MFPs) are required. Council has undertaken indicative work to identify where the MFPs need to be located. An indicative Lighting Plan showing the location of the MFPs, meter zones and meter boxes has been attached. The public domain finishes of the roads must be in accordance with Council's Public Domain Technical Manual. With regards to both proposed roads to be delivered it is noted that the subject sites are subject to car sharing which has not been detailed within the SSDA and associated plans. Further clarification on this matter is required and whether these spaces are to be located on the road or within the individual developments.

Another matter to be clarified is where the intended vehicular access points will be for 1-17 Delhi Road. In this respect, the submitted plan indicates that there will be only one vehicular access point to 1-17 Delhi Road from Station Street. This must be further detailed and addressed as part of the SSDA.

The movement of cyclists must also be addressed. There does not appear to be any details regarding access for cyclists through the proposed roads. This must be clarified. In particular it is noted that Figure 13 of the NRSP DCP identifies a pedestrian / cyclist shareway extending along Station Street and pedestrian upgrade along Road 38. An extract has been provided below.



It should also be noted that the Parsons Brinckerhoff, *North Ryde Station Precinct Project - Transport Management and Accessibility Plan*, November 2012 (p. 151) identifies a need to 'investigate opportunities to improve pedestrian and bicycle access from the southern side of Epping Road at Pittwater Road to North Ryde Station'. This does not appear to have occurred. Clarity is required whether this is to take place at a later date or whether it is considered unfeasible or no longer necessary.

It is noted that the Appendix A – Infrastructure Schedule of the Finalisation report for the North Ryde Station Precinct identifies a series of infrastructure items to be delivered. Council believes that clarification should be provided on the following items:

- Item 5 – Connection of Road 38 and Lucknow Road in both directions to be undertaken by UGNSW or developer of Station site south. The proposed Transport Impact Assessment approves the limiting of Lucknow Road to one way but Council is of the opinion that the access designed as two-way, but some barricade system making the operation as one-way. This would allow Council to then revert the access into a 2-way street post implementation, after a review of the operation of this location. In this way, if the site is deemed as beneficial as being a 2-way, there will not have to be the opening of the roadway, just the removal of some sort of bollard/barrier scheme.
- Item 7 - Provide passenger set-down/pick up and bicycle parking in Station Street. No bicycle parking is proposed as part of this SSSA. Clarification is sought whether this will apply to future development of 1-17 Delhi Road or this application.
- Item 9 - New bus facilities at Epping Road outbound stop at Delhi Road. Clarification is sought as to when this item is no longer required or when it will be delivered.

- Item 12 – Install way finding and directional signage throughout the precinct and as site entry points. Clarification is sought as to when this will be delivered.
- Item 19 - Pedestrian Plaza, Station Precinct minimum area of 2,000m<sup>2</sup>. Clarification is sought as to when this will be delivered.
- Item 24 – Number of regional transport measures have been identified to reduce congestion in the Macquarie Park area including widening Delhi road and associated intersections, modifying the on-ramp from Lucknow Road to Epping Road, Modifying the Pittwater Road / Epping Road intersection. Clarification is sought as to when this will occur. It is noted that UGNSW have identified that this will be ultimately the responsibility of the RMS for their completion, but it is not identified within the SSDA.

With regards to the public domain to be delivered it should be noted that the dedication of these areas has not yet been finalised with Council. This is the subject of ongoing discussions with UGNSW.

## Station Street

The proposed road design of Station Street fails to comply with the road design detailed within the DCP. The DCP controls provided at Section 4.1 Streets require Station Street to be a minimum width of 28.5m. The proposed design seeks to reduce this to 20.75m, resulting in a total reduction of 7.75m. This reduction is the result of:

- Removal of the 3m swale in the centre of the street
- Reduced vehicle carriageway width from 4.5m to 3.25m
- Reduced footpath width from 6.5m to 3m.

The proposed reduction in width is not supported. The reduction of the proposed footpath width is not considered appropriate as the NRSUAP has been predicated on non-car transport options such as cycling, walking and public transport. In this respect, to provide a positive pedestrian environment around the station, footpath widths should be as generous as possible. Furthermore, it is noted that the Station North Site will be developed in the near future and adaptability should be built into the infrastructure through generous footpaths to ensure that access to the station can be achieved from Station Street. The prioritisation of pedestrians as identified in the Parsons Brinckerhoff study can only be achieved where reasonable and appropriate footpaths are provided.

Should the reduction in the width of the footpath continue to be pursued it must be predicated on further information being submitted which details pedestrian movements in the context of local attractors, foot traffic generators and desire lines. This would need to consider the following:

- Termination point of the footbridge over Delhi Road and anticipated pedestrian movements,
- Local facilities and amenities,
- Open space to be delivered on 27-37 Delhi Road, and

- Potential and existing access points to North Ryde Station

With regards to the deletion of the swale, Council's stormwater engineers have not identified any issues with this on stormwater grounds. However, with regards to traffic movements, the swale would have prevented u-turning within Station Street. Alternate treatment methods such as a median strip may be required to prevent U-turns. This is of particular concern given that the proposed shared way has not been designed to allow for vehicle passing. It must also be considered whether the prevention of right turns into the vehicle entrance to Station Site North is required. The deletion of the swale results in the removal of street tree planting and vegetation which significantly changes the character of Station Street. It is noted that the Transport Impact Assessment identifies that this planting has been recovered elsewhere in the NRSP but that this has yet to be detailed. This potential loss of greenery should be avoided.

The overall reduction in the width of Station Street should not be considered purely on vehicle and pedestrian usability alone but it should also be recognised that the width of the road has been provided due to the significant building heights delivered under the NRSP. The road allows for much needed separation between the Station Site North and the Station Site South. Any proposed reduction in the width of Station street must be carefully considered, especially given that there are no details regarding the building heights or treatments for future development of 1-17 Delhi Road.

In addition to the above, it is noted that Council has received a referral from Roads and Maritime Services (RMS) in response to the DA lodged for 27-37 Delhi Road. This referral has stated:

*Transport for NSW (TfNSW) has previously advised that Station Street, should be designed to accommodate a turning circle for buses. It is noted that the turning area has not been designed to accommodate buses and has a 12.5 metre radius turning head. TfNSW advises this should be at least 20 metres to allow buses to turnaround.*

As such, it is presumed that the shared area must be amended in design to allow for buses. Should buses be required to have access along Station Street, location and details of proposed bus stops and associated infrastructure must be provided. The provision of buses through the shared way must be carefully considered to ensure that pedestrian safety is not at risk.

With regards to the proposed shared way and the submitted Signage Plan, it is considered that additional entry signage for the Shared Zone is required. Furthermore, the signage should be coordinated with the proposed MFPs as identified in the attached Lighting Plan. Any proposed signage plans would need to be considered by the Traffic Committee. The updated signage plan can be reviewed by Traffic Committee on 31 July 2014, however this would need to be provided to Council by 16 July 2014. Additionally, given that the submitted plans have identified a singular vehicle entry point for the Station Site North, the shared zone must allow for access by Council's Waste Truck. Should the Department not support the request of Transport for NSW to widen the turning head to 20m, a swept path analysis for a medium rigid vehicle (9.8m truck) must be provided.

In addition to the above, it is noted that the swept path analysis indicates that there will not be sufficient space for vehicles to pass one another in the same direction along Station Street. This is of significant concern given that this area is likely to be used for drop-off/pick-ups which may require some waiting time. It must also consider what will occur should a vehicle breakdown within the shared way. It is also noted that the 1/6 ramp grade will not comply with current design practices with respect to ramp face grades on a raised threshold area for pedestrian use (refer to RMS technical direction TDT 2001/04a).

It is also noted that no public domain works are proposed to the north and west of the shared way. It must be clarified where the proposed shared way will be accessed from. Particular reference is made to the pedestrian bridge over Delhi Road and whether it is proposed that there will be any form of access to this bridge.

A critical concern with the proposed design for Station Street is that there appears to be little co-ordination between the proponents of 27-37 Delhi Road and the submitted SSDA documentation. Council has been advised that there has been meetings and discussions between both applicants but that this does not appear to have been fully detailed or realised in the overall design of the proposal. Key areas of concern include:

- Ambiguity between the levels of the public domain and associated work under the SSDA and 27-37 Delhi Road,
- Lack of coherence in the design of Road 38.
- The proposed shared way, one way system around park to be delivered as part of 27-37 Delhi Road.

## Road 38

As identified previously it should be noted that the proposed development for 27-37 Delhi Road proposes a total width of 15m (boundary to boundary). This is below the width of 17.5m required under the NRSP DCP 2013. This causes some concern regarding how the intersection of Station Street, Trinity Road link and Road 38 is to function.

In Council's opinion the proposed Road 38 should comply with the requirements of the DCP, which requires a minimum width of 17.5m. However it is noted that the proposed road includes 3 trafficable lanes at the intersection of Road 38 and Delhi Road, which is different to that nominated within the DCP. This must be maintained in order to facilitate sufficient vehicular movement. It is noted that the proposed Road 38 design does not allow for a footpath along the eastern edge of the road. This is not supported and Council recommends the provision of a footpath a minimum of 3m in accordance with the NRSP DCP 2013.

Given the volumes of traffic likely to utilise Station Street as a drop off / pick up zone and potentially generated from 27-37 Delhi Road, it is recommended that the proposal incorporate supplementary traffic management equipment such as advanced loop detectors to assist in traffic management of the traffic signals at intersection of Road 38 and Delhi Road. This could be located in Station Street or Road 38.

Further to the above, the concerns regarding the intersection of Station Street and Road 38 detailed within the Station Street section of this submission apply.

## Biodiversity

It is noted that the proposal did not include a Street Tree Plan as identified within the NRSP DCP 2013. The submitted Landscape Plan does not provide any details regarding species or tree pit details. These should be detailed in accordance with the requirements of the NRSP DCP 2013 and Council's Street Tree Masterplan 2013. In this respect, Council is of the opinion that at least two of the following species should be planted:

- *Angophora costata* (Smooth Barked Apple)
- *Eucalyptus haemastoma* (Scribbly Gums)
- *Eucalyptus racemosa* (Snappy Gum)
- *Corymbia eximea* (Yellow Bloodwood)
- *Melaleuca decora* (White feather honey myrtle)
- *Allocasuarina torulosa* (Black She oak)

## Flooding and Stormwater

In considering the proposed stormwater infrastructure for the site, Council has been liaising with the Robert Bird Group. To date, Council is unable to finalise the review process due to the following reasons:

- There is an inconsistency in the flow rates detailed in section 4.5 of the Stormwater Management Plan and the DRAINS model flow rates. Council is awaiting the provision of the DRAINS model to further investigate this discrepancy.
- The time of concentration of 5 minutes was used for all sub catchments in the DRAINS mode. Using a time of concentration for a catchment area of 0.626 ha is unusual. Therefore, City of Ryde has requested to submit the time of concentration calculation sheet for the sub catchments.

## Utilities & services

Council's records indicate that the subject site is affected by easements (including but not limited to access right-of-ways and drainage easements).

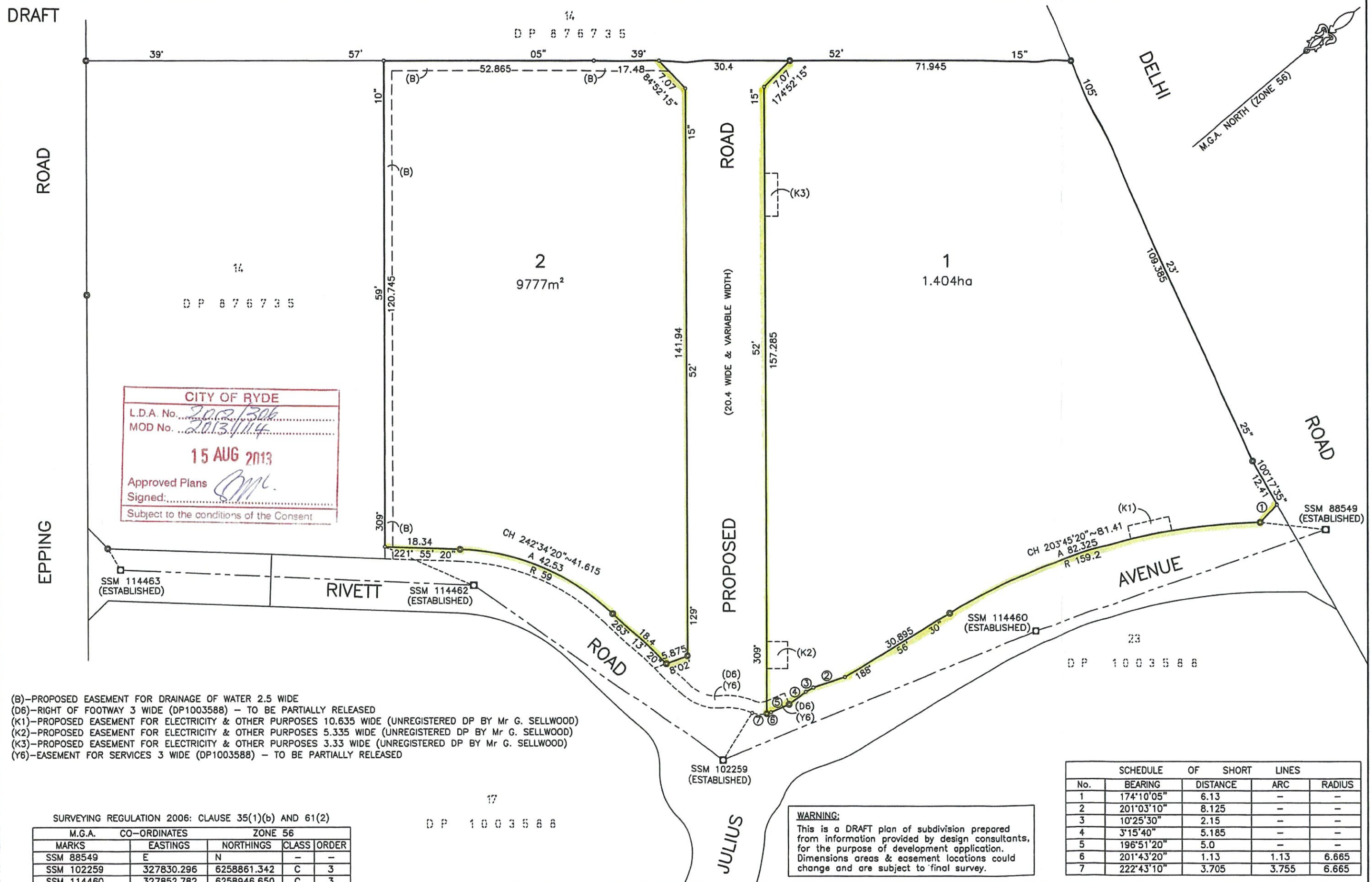
These are identified in DP 1131774, DP 1187161, and DP 104833. It is noted that Drawing Number C0-01 Revision 4 prepared by Robert Bird Group includes a note that details of easements are contained in the Schedule of Easements and Stratum Statements on DP and Title Documents. Whilst this plan shows some of the easements it does not include an easement under DP 104833 which provides access to an existing substation located on the site. This easement must be addressed under any forthcoming development application.

With regards to the proposed utilities Council has provided an indicative Lighting Plan which includes meter boxes and zones. This must be compatible with the proposed utility connections.

## Construction & operation impacts

Council is of the opinion that a Preliminary Construction Management Plan should be prepared prior to the approval of the SSDA. This is to allow Council to understand the area of impact as a result of the proposed construction activity. A Preliminary Plan is required as the development is expected to generate a large movement of trucks. This is anticipated to have a large scale impact on the traffic network. Alternatively should the proposal be subject to conditions, this may be required prior to issue of any Construction Certificate and provided to Council's satisfaction.

DRAFT



- (B) - PROPOSED EASEMENT FOR DRAINAGE OF WATER 2.5 WIDE
- (D6) - RIGHT OF FOOTWAY 3 WIDE (DP1003588) - TO BE PARTIALLY RELEASED
- (K1) - PROPOSED EASEMENT FOR ELECTRICITY & OTHER PURPOSES 10.635 WIDE (UNREGISTERED DP BY Mr G. SELLWOOD)
- (K2) - PROPOSED EASEMENT FOR ELECTRICITY & OTHER PURPOSES 5.335 WIDE (UNREGISTERED DP BY Mr G. SELLWOOD)
- (K3) - PROPOSED EASEMENT FOR ELECTRICITY & OTHER PURPOSES 3.33 WIDE (UNREGISTERED DP BY Mr G. SELLWOOD)
- (Y6) - EASEMENT FOR SERVICES 3 WIDE (DP1003588) - TO BE PARTIALLY RELEASED

SCHEDULE OF SHORT LINES				
No.	BEARING	DISTANCE	ARC	RADIUS
1	174°10'05"	6.13	-	-
2	201°03'10"	8.125	-	-
3	10°25'30"	2.15	-	-
4	3°15'40"	5.185	-	-
5	196°51'20"	5.0	-	-
6	201°43'20"	1.13	1.13	6.665
7	222°43'10"	3.705	3.755	6.665

**WARNING:**  
This is a DRAFT plan of subdivision prepared from information provided by design consultants, for the purpose of development application. Dimensions areas & easement locations could change and are subject to final survey.

SURVEYING REGULATION 2006: CLAUSE 35(1)(b) AND 61(2)

M.G.A.	CO-ORDINATES		ZONE 56	
MARKS	EASTINGS	NORTHINGS	CLASS	ORDER
SSM 88549	E	N	-	-
SSM 102259	327830.296	6258861.342	C	3
SSM 114460	327852.782	6258946.650	C	3
SSM 114462	327747.136	6258842.593	C	3
SSM 114463	E	N	-	-

SOURCE: M.G.A. CO-ORDINATES ADOPTED FROM SCIMS AT 26TH JUNE 2012  
COMBINED MEAN SEA LEVEL SCALE FACTOR 0.99

Surveyor : GREGORY K. OXLEY  
LandPartners Limited  
PO Box 389  
Rydmere BC NSW 2116  
Date of Survey :  
Surveyor's Ref : 73119

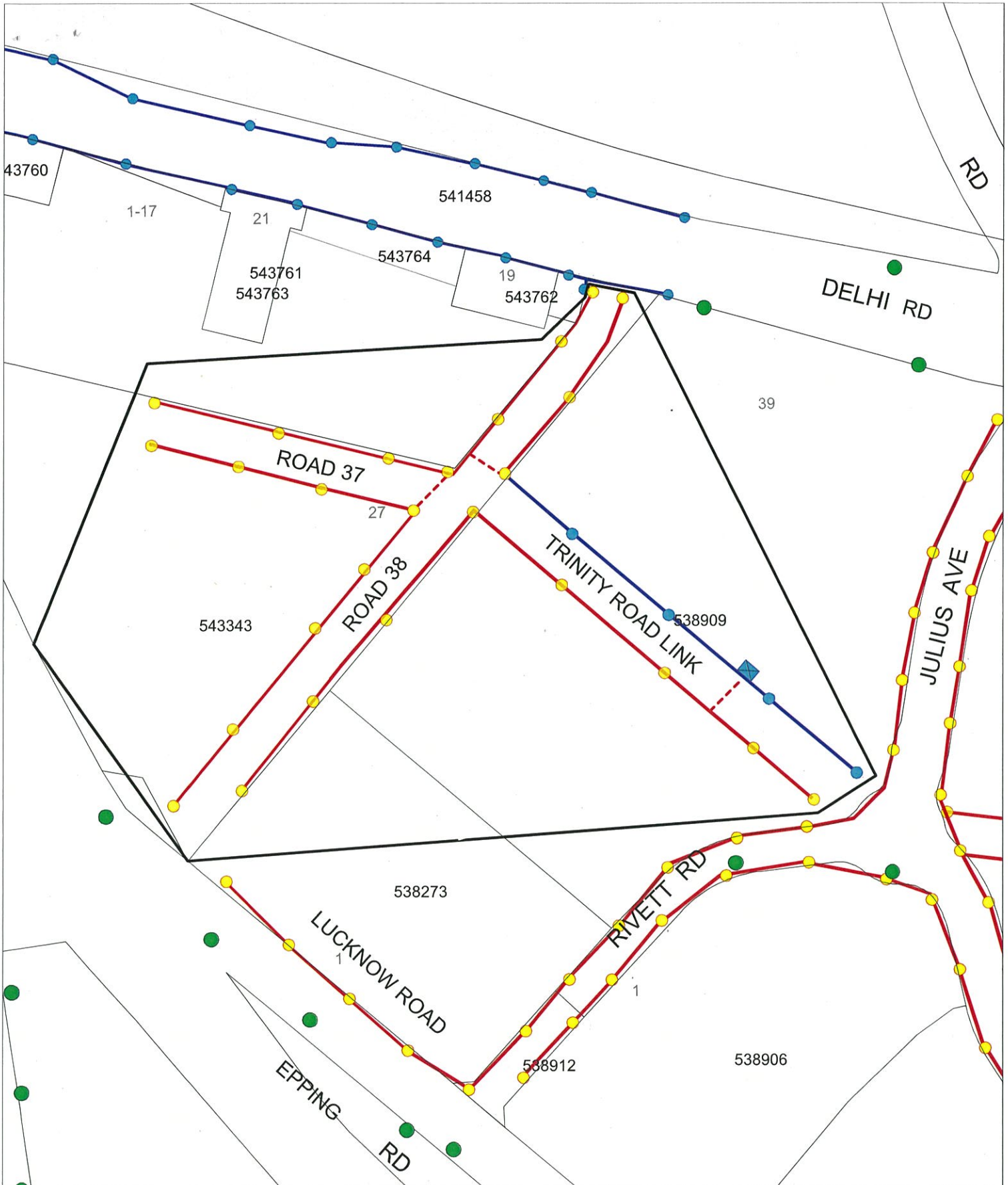
PLAN OF SUBDIVISION OF LOT 21 IN DP 1003588

LGA: RYDE  
Locality : NORTH RYDE  
Subdivision No:  
Lengths are in metres. Reduction Ratio 1: 600

Registered

DRAFT - V6  
(easement Amended)  
08/07/13





**Legend**

-  Energy Australia Lights
-  Proposed Street Lighting
-  Existing MFP Street Lighting
-  Meter Zones
-  Meter Boxes

**Proposed & Existing Streetlighting NRSP Delhi Road Macquarie Park**



City of Ryde

Operator:	M.Simpson
Department:	Asset Systems
Drawing No: N/A	NRSP Delhi Road
Date: 08/05/2014	Scale: 1:1700

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