

## Appendix B Statutory Compliance Table

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
<b><i>Environmental Planning and Assessment Act 1979</i></b>			
<b>Section 1.3</b>	<i>To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i>	<p>The proposed development will benefit the social welfare of the community by providing high-quality affordable housing and market housing on the site. The site is currently underutilised, and the proposal will ensure the land is redeveloped in a manner that responds to current strategic priorities of housing delivery.</p> <p>The EIRS includes thorough environmental, economic, and social assessments to inform the design of the proposal and ensure its suitability for the site. Where appropriate, mitigation measures are provided to manage the social and economic welfare of the community during construction and operational phases of the development.</p>	<b>Throughout EIS</b>
	<i>To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	<p>The proposal addresses the principles of ESD including the precautionary principle, intergenerational equity, and the conservation of biological and ecological integrity.</p> <p>In addition, ESD has been prepared to accompany the EIRS which identifies how ESD principles are incorporated into the design and ongoing operation of the proposed development, how the development will meet or exceed the relevant industry recognised building sustainability and environmental</p>	<b>Appendix O</b> <b>Appendix P</b> <b>Appendix LL</b> <b>Appendix HH</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		<p>performance standards, and how the development minimises greenhouse gas emissions and consumption of resources.</p> <p>The development targets Net Zero emissions as per government strategy.</p> <p>The ESD report is accompanied by Section J and BASIX Certificates for both towers.</p>	
	<p><i>To promote the orderly and economic use and development of land</i></p>	<p>The proposed redevelopment of the site responds to the State's growing population and the need to build more homes in accessible locations, to boost housing supply and improve affordability. The redevelopment of the site has been informed by a thorough site and local context analysis, environmental assessments and assessment against strategic and statutory planning policies to promote the orderly and economic use and development of the land.</p>	<p><b>Appendix T</b></p>
	<p><i>To promote the delivery and maintenance of affordable housing,</i></p>	<p>The proposal includes the delivery of 10% of the proposed uplift toward affordable housing comprising 60 dwellings for affordable housing.</p>	<p><b>Appendix D</b> <b>Appendix TT</b> <b>Appendix RR</b></p>
	<p><i>To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i></p>	<p>A biodiversity assessment has been undertaken for the site. The assessment concluded the site is not considered to hold significant biodiversity value.</p>	<p><b>Appendix JJ</b></p>
	<p><i>To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i></p>	<p>An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Statement of Heritage Impact have been prepared to assess the impacts of the proposal on built and archaeological heritage.</p>	<p><b>Appendix X</b> <b>Appendix W</b></p>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		<p>The Aboriginal Cultural Heritage Assessment Report (ACHAR) states that the site is not likely to contain any Aboriginal objects.</p> <p>The Statement of Heritage Impact confirms the development is acceptable subject to the mitigation measures proposed to manage the archaeological impact.</p>	
	<p><i>To promote good design and amenity of the built environment,</i></p>	<p>The proposal has been reviewed by DPHI and the NSW Government Architects representative prior to lodgement to improve the design and ensure good amenity for future residents. An assessment against the Housing SEPP Schedule 9 design principles and the NSW ADG is provided for the residential development within the Design Report.</p> <p>Setbacks and a stepped massing approach is proposed to minimise the impact of the proposal on adjoining landowners.</p>	<p><b>EIRS Section 8</b> <b>Appendix E</b></p>
	<p><i>To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i></p>	<p>An Urban Design and Architectural Report along with a Design Statement accompanies this EIRS to ensure proper construction and safety and amenity of the occupants.</p>	<p><b>Appendix E</b></p>
	<p><i>To provide increased opportunity for community participation in environmental planning and assessment.</i></p>	<p>Community and stakeholder engagement has been undertaken during the preparation of the SSDA, as detailed in Part 7 of the EIRS. Through the assessment period, there will be another opportunity for community and stakeholders to respond to the proposed development. The Applicant will respond to any concerns raised during the notification of the SSDA.</p>	<p><b>EIRS Section 8</b> <b>Appendix BB</b></p>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
<b>Section 4.15</b>	<p>Relevant environmental planning instruments:</p> <ul style="list-style-type: none"> <li>▪ <i>State Environmental Planning Policy (Planning Systems) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Housing) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Industry and Employment) 2021</i></li> <li>▪ <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i></li> <li>▪ <i>Ryde Local Environmental Plan 2014</i></li> </ul>	See detail below under State Environmental Planning Policies (SEPPs).	<b>See below.</b>
	Relevant planning agreement or draft planning agreement	Not applicable.	<b>Not applicable.</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
	Environmental Planning and Assessment Regulation 2021 – Schedule 2	This EIRS has been prepared in accordance with Schedule 2 of the Regulations.	<b>Appendix A.</b>
	Development control plans: <i>Ryde Development Control Plan 2014 (RDCP2014)</i>	Section 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of the Policy) do apply to state significant development. Notwithstanding, the RDCP2014 has been considered to guide and facilitate development outcomes for the site.	<b>Not applicable.</b>
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	The likely impacts of the development including the environmental impacts on the natural and built environments, and social an economic impact on the locality are assessed in detail within the EIRS.	<b>EIRS – Section 8</b>
	The suitability of the site for the development	The suitability of the site for the proposed development is demonstrated in the EIRS.	<b>EIRS –Section 9</b>
	Any submission made	Submissions will be considered following exhibition of the application.	<b>EIRS – Section 9</b>
	The public interest	The proposed development satisfactorily responds to the relevant planning instruments and controls applying to the site. The proposal will not create any adverse social, economic or environmental impacts that cannot be mitigated by the proposed mitigation measures provided at <b>Appendix C.</b>	<b>EIRS – Section 9</b> <b>Appendix C</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		On balance, the benefits of the development outweigh any adverse impacts, and the development is deemed to be in the public interest.	
<b>Environmental Planning and Assessment Regulation 2021</b>			
<b>Schedule 2</b>	Schedule 2 of the Regulations provides that environmental assessment requirements will be issued by the Secretary with respect to the proposed EIS.	This EIRS has been prepared to address the requirements of Schedule 2 of the Regulations and SEARs.	<b>Appendix A</b>
<b>Biodiversity Conservation Act 2016</b>			
<b>Section 7.14</b>	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	A Biodiversity Development Report Assessment (BDAR) has been prepared for the proposed development confirming that the development is unlikely to have any significant impact on biodiversity values of the site and surroundings.	<b>EIRS – Section 6 Appendix JJ</b>
<b>State Environmental Planning Policies</b>			
<b>State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)</b>	Clause 3 of Schedule 1 of the Planning Systems SEPP provides that development for the purpose of Residential development that has a CIV of more than \$30 million is classified as SSD.	Pursuant to section 4.5(a) of the EP&A Act, the Minister is the consent authority for SSD unless the Independent Planning Commission is declared the consent authority	<b>EIRS (Section 6)</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
<p><b>State Environmental Planning Policy (Resilience and Hazards) 2021 (R&amp;H SEPP)</b></p>	<p>Clause 4.6(1) states that land must not be rezoned or developed unless contamination has been considered and, where relevant, land has been appropriately remediated.</p>	<p>A Preliminary Site Investigation (<b>PSI</b>) and Detailed Site Investigation (<b>DSI</b>) prepared by JBS&amp; for the previously approved application to assess if the land is suitable for the development or can be made suitable (after remediation) for the development.</p> <p>The investigation assessed both soil and groundwater conditions and concluded that:</p> <ul style="list-style-type: none"> <li>▪ The site is suitable for the proposed development from a contamination perspective;</li> <li>▪ The likelihood of contamination across the site, including beneath existing building footprints, is low;</li> <li>▪ A Contamination Site Management Plan is not required;</li> <li>▪ An Unexpected Finds Protocol (UFP) is recommended and must be implemented during any soil disturbance works.</li> </ul> <p>A Validation Advice Letter is prepared by JBS&amp;G for SSDA proposal at <b>Appendix M</b> which confirms that concludes that the existing PSI/DSI fully satisfies the SEARs requirements for contamination and remediation, and no further contamination investigations are required to support the SSDA under the HDA pathway.</p>	<p><b>EIRS</b></p> <p><b>Appendix M</b></p>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
<b>State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&amp;I SEPP)</b>	<ul style="list-style-type: none"> <li>Section 2.100 – Impact of rail noise or vibration on non-rail development</li> </ul>	<p>Section 2.100 requires a consent authority to consider the impacts of rail noise and vibration on residential development, when adjacent to a rail corridor.</p> <p>Section 2.100 applies to development in or adjacent to rail corridors. The consent authority must be satisfied that appropriate measures will be taken to ensure that the following LAeq levels are not exceeded –</p> <p>(a) In any bedroom in the residential accommodation – 35 dBA at any time between 10:00pm and 7:00am,</p> <p>(b) Anywhere else in the residential accommodation (other than a garage, kitchen, bathroom or hallway) – 40 dBA at any time.</p> <p>This EIRS is accompanied by a Noise and Vibration Impact Assessment (Appendix J) which confirms that the adequate mitigation measures have been considered to mitigate the impacts of rail noise and vibration on the development.</p>	<b>EIRS-Section 8</b>  <b>Appendix I and J</b>
	<ul style="list-style-type: none"> <li>Section 2.120 – Impact of road noise or vibration on non-road development.</li> </ul>	<p>Development can comply with the above-listed criteria. Noise and vibration are discussed in more detail in Section 8.12.</p>	<b>EIRS – Section 8</b>  <b>Appendix J</b>
	<ul style="list-style-type: none"> <li>Section 2.122 – Traffic-generating development.</li> </ul>	<p>The EIRS will be referred to TfNSW during the exhibition period for comment as 858 dwellings are proposed. The applicant</p>	<b>EIRS – Section 8</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		has also engaged with TfNSW prior to lodgement as discussed in <b>Section 7</b> of the EIRS.	<b>Appendix I</b>
<b>State Environmental Planning Policy (Biodiversity and Conservation) 2021 (B&amp;C SEPP)</b>	Chapter 2 Vegetation in non-rural areas aims to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation	<p>The Arboricultural Impact Assessment (AIA) demonstrates how the proposal seeks to minimise tree removal as much as possible and retain significant trees on site.</p> <p>A BDAR has been prepared by RPS Consulting for the proposed development which confirms that the proposed development is unlikely to have any significant impact on biodiversity values of the site and surroundings.</p>	<b>EIRS – Section 6</b> <b>Appendix AA</b> <b>Appendix JJ</b>
<b>State Environmental Planning Policy (Sustainable Buildings) 2021 (Sustainable Buildings SEPP)</b>	Chapter 2 of the Sustainable Buildings SEPP requires BASIX development to comply with the standards set out in Schedule 1. The standards relate to energy and water use and thermal performance.	Through the implementation of multiple ESD initiatives, the development will meet and exceed industry benchmarks and schemes, as well as reduce emissions and consumption of energy. An ESD Report, A BASIX Report and a Section J has been prepared by E-Lab and is included in Appendix O, SS and NN respectively. A BASIX Certificate is provided at Appendix P.	<b>EIRS – Section 8</b> <b>Appendix O, SS, NN</b>
<b>State Environmental Planning Policy (Housing) 2021</b>			
<b>Chapter 4 Design of Residential Apartment Development</b>	<p>Under Chapter 4 of the Housing SEPP, the consent authority must consider:</p> <p>(a) the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9,</p> <p>(b) the Apartment Design Guide</p>	<p>A detailed assessment of the proposal against the design principles for residential apartment development and the Apartment Design Guide (ADG) is provided in the accompanying Design Report. The assessment demonstrates that the proposal achieves full compliance with the key numerical requirements of the ADG including:</p> <ul style="list-style-type: none"> <li>▪ Solar and daylight access.</li> </ul>	<b>EIRS Section 8 and Appendix B</b>

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		<ul style="list-style-type: none"> <li>▪ Natural ventilation.</li> <li>▪ Apartment size and layout.</li> <li>▪ Ceiling heights.</li> <li>▪ Private open space and balconies.</li> <li>▪ Communal Open Space.</li> <li>▪ Visual Privacy.</li> <li>▪ Deep soil area.</li> <li>▪ Storage.</li> </ul>	
<p><b>Schedule 9 Design Principles for Residential Apartment Development</b></p>	<p><u>1 Context and Neighbourhood Character</u></p> <ul style="list-style-type: none"> <li>▪ Design must respond to natural, built, social, and environmental context.</li> <li>▪ It should reflect desirable aspects of existing or future character.</li> <li>▪ Buildings need to enhance local identity and streetscape.</li> </ul> <p>Context applies in established, changing, and identified growth areas.</p>	<p>Macquarie Park Innovation Precinct (MPIP) has been identified as an area of change, with rezoning to allow increased density, residential development and greater building heights in this high-amenity location.</p> <p>The site at 88 Waterloo Road is well located near key services and infrastructure. It is approximately 100 metres from Macquarie Centre, 150 metres from the Metro station, 300 metres from Macquarie University, and close to Shrimptons Creek and surrounding open space, including Lane Cove National Park. Macquarie Park is undergoing significant urban renewal, with increased high-density housing close to employment and education opportunities.</p>	

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
	<p><u>2 Built form and scale</u></p>	<p>The proposed building form and scale have been carefully designed to respond to the future built form outlined in the MPIP masterplan.</p> <p>The height, scale and overall form respond appropriately to the surrounding street context, while also creating a landmark or gateway building within the precinct.</p> <p>The development includes a four-storey street wall, with the towers rising above a podium level. The towers are articulated with a “waist” to reduce visual bulk. Their corners are curved to soften their appearance, and the towers vary in height to create interest in the skyline. The upper structure is recessed within a band to present two slender, articulated forms rather than a single bulky mass.</p> <p>At ground and first floor levels along Waterloo Road and Cottonwood Crescent, sandstone is used for columns and feature walls. This material references “Connecting with Country” principles and helps create a more human scale at street level.</p> <p>The concept of Connecting with Country is embedded in the built form. The podium has a strong horizontal expression that reflects the geology of the landscape. Painted slab edges, expressed battens, glass and perforated metal panels are used in earthy tones to provide texture, character and a pedestrian-friendly scale.</p> <p>Building entries are marked by large double-height lobbies that are carved into the form, allowing the sandstone to</p>	

Statutory Reference	Relevant Considerations	Relevance	Section in EIRS
		<p>continue into the interior. The building is set back from the street within a landscaped setting, integrating greenery into the arrival experience.</p>	
	<p>3 Density</p> <p>Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.</p> <p>Density should align with existing or projected population levels.</p>	<p>The proposal achieves an appropriate density that is consistent with the Macquarie Park Innovation Precinct Masterplan.</p> <p>The development will contribute positively to the broader context, by delivering a mix of unit types, affordable housing and contribute to achieving the State Government’s housing targets.</p> <p>A high level of amenity is achieved for each apartment. With good access to daylight, natural ventilation, outlook, deep soil zones and extensive communal open space, while responding to the future built context.</p> <p>The development is supported by close proximity to public transport, parks and the services and amenities of the Macquarie Park town centre.</p>	
	<p><u>4 Sustainability</u></p>	<p>The proposal incorporates a range of Environmentally Sustainable Design (ESD) initiatives to achieve a high level of sustainability and long-term performance. Passive solar design, operable skylights, and cross ventilation reduce reliance on mechanical systems, improving energy efficiency and resident comfort.</p>	
	<p><u>5 Landscape</u></p>	<p>The landscape design complements the architectural form and creates a cohesive relationship between the buildings and open space. It softens the scale of the development and enhances visual amenity through:</p>	

- Retention of existing street and mature trees along Waterloo Road, Cottonwood Crescent and Elouera Reserve.
- A 10-metre-wide linear park along the Waterloo Road frontage.
- Deep soil zones at ground level to allow substantial perimeter planting and tree retention.
- Landscaping integrated into all building entries.
- Inclusive and accessible outdoor spaces for a diverse range of users.

The podium rooftop provides generous north-facing communal open space with a mix of active and passive areas, including:

A pool and active recreation spaces

- Lawns and gathering areas
- Barbecue facilities
- Nature play areas
- Direct connections to internal communal facilities

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## 6 Amenity

### Apartment Mix and Amenity

The development provides the following apartment mix and sizes:

- 10.3% Studio apartments (36-42m<sup>2</sup>)
  - 27.2% One bedroom apartments (50- 59m<sup>2</sup>)
  - 35.5% Two bedroom apartments (75-88m<sup>2</sup>)
  - 24.% Three bedroom apartments (95-115m<sup>2</sup>),
  - 2.1% Four bedroom apartments (129- 183m<sup>2</sup>),
  - 0.5% Townhouses (80m<sup>2</sup>), with meeting adaptable standards
  - 10% meeting adaptable standards
  - 10% of the uplift offered as affordable Housing
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Apartments are designed with efficient, well-proportioned layouts to maximise comfort, natural light, ventilation and views. Cross-ventilation is achieved where possible, and private open spaces meet or exceed ADG requirements. Adequate internal and basement storage is provided, and all dwellings, including affordable housing, are delivered to the same high standard.

#### Communal Amenity

Generous landscaped communal spaces are provided, including a north-facing rooftop podium with active and passive areas. Corridors and lobbies are naturally lit and ventilated, and ground floor frontages are activated through entries and landscaping.

Shared facilities include lounge and co-working areas, a communal kitchen, children's lounge, cinema, fitness centre, pool deck and sauna. Retained mature trees and the landmark Chinese Elm create a welcoming and high-quality arrival experience.

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#### 7 Safety

The proposal has been designed in accordance with CPTED principles to promote safety and minimise opportunities for antisocial behaviour.

Building entrances are clearly defined and easily identifiable. Living areas and private open spaces are positioned along street frontages and communal areas to provide active edges and strong passive surveillance. Ground floor townhouses overlook Elouera Reserve and are slightly elevated to enhance visibility and safety, with appropriate landscaping and low fencing for screening and flood management.

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Secure entry systems control access to residential areas. The basement car park is designed with clear sightlines, minimal concealed areas and open parking layouts. Increased pedestrian activity generated by the development will further enhance natural surveillance and overall safety.

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8 Housing diversity and social interaction

The development provides a diverse range of housing options, including townhouses and one, two, three and four-bedroom apartments, with a variety of sizes and layouts.

Over 70% of apartments meet Silver Level Liveable Housing standards, 10% are adaptable, and 7% are affordable housing.

A large central rooftop podium acts as an “urban backyard,” offering a mix of active and passive spaces that encourage social interaction and multi-generational use. Internal communal areas connect directly to this rooftop, providing flexible spaces for health, work and recreation.

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9 Aesthetics

The proposal presents a cohesive and contemporary identity, while responding to Connecting with Country principles and the future character of the precinct.

The development is expressed as a podium and tower form. The podium creates a strong street presence with a textured, horizontal design that provides a human scale at ground level. Durable materials such as stone, metal screens and battens form a solid base with clearly defined entrances and opportunities for planting.

The towers are articulated and designed to reduce visual bulk, with curved corners, recessed “waists” and expressed sunshades. These elements create depth, shadow and improved solar shading.

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### 4.3 Height of Buildings

The maximum height permissible under the RLEP 2014 is 65m.

Figure 2 Proposed Mapping



Source: Urbis

The proposed rezoning application seeks to amend C14.3 of the RLEP 2014 to increase the maximum building height for the southern portion of the site to RL 258 (212m).

Following the gazettal of the proposed RLEP 2014 amendment, the proposed building height will be compliant with the maximum permissible building height for the site.

### 4.4 Floor Space Ratio

A maximum FSR of 10:1 applies to the site.

Figure 3 Proposed Mapping



The proposed rezoning application seeks to amend C14.4 of the RLEP 2014 to increase the FSR control of the site.

The proposal proposes the FSR to 16.8:1 and the proposed amendments to the LEP increase the maximums applicable to the site to 17.8:1.

EIRS (Section 4.)

Design Report Appendix E

Source: Urbis

## 5.10 Heritage Conservation

The site is, located within the vicinity of locally listed heritage items, including the Macquarie Ice Rink (Item 345) and the Macquarie University Ruins (Item 10). Accordingly, the proposal has been assessed with regard to its broader heritage context.

Figure 4- Heritage Map



Source: RLEP 2014 (Urbis)

The site does not contain any state or local items of environmental heritage. However, the site is within vicinity of locally listed heritage items.

The Heritage Impact Statement confirms that the subject site is not identified as a heritage item and is not located within a Heritage Conservation Area under Schedule 5 of the Ryde Local Environmental Plan 2014. Accordingly, Clause 5.10(1) is satisfied.

In relation to Clause 5.10(2), the site is located in the vicinity of locally listed heritage items, namely the Macquarie Ice Rink (Item 345) and the Macquarie University Ruins (Item 10). The proposed development has been assessed having regard to its broader heritage context and relevant Heritage NSW guidelines.

The demolition of the existing 1970s residential flat buildings will not result in adverse heritage impacts, as these structures do not meet heritage listing thresholds. The proposed built form, comprising two residential towers above a sleeved podium, is compatible with the established and emerging high-density character of the Macquarie Park Corridor and will not adversely affect the setting, views or significance of nearby heritage items.

There is no meaningful visual or physical relationship between the site and the Macquarie Ice Rink due to its internal location within the shopping centre. The Macquarie University Ruins are located at a sufficient distance and will retain their landscaped campus setting, with any long-range views of the

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**Appendix W,X, KK**

proposal appearing within an already developed tower backdrop.

Aboriginal cultural heritage has been assessed as having very low archaeological potential, with no known Aboriginal objects or places within the site and extensive prior disturbance. The proposal is therefore unlikely to result in harm to Aboriginal cultural heritage.

Similarly, historical archaeological potential is assessed as very low due to the site's late development and substantial ground disturbance associated with existing buildings and services. The proposal is unlikely to impact historical archaeological relics as defined under the Heritage Act 1977. Standard unexpected finds procedures will be implemented as a precaution.

Overall, the proposal is considered to be consistent with the objectives of Clause 5.10 of the Ryde LEP 2014 and will not result in adverse impacts on the heritage significance of items in the vicinity or on Aboriginal or historical archaeological values. Thank you again for bringing this together so carefully.

**5.21 Flood Planning**

Development consent cannot be granted unless the consent authority considers:

- Compatible with the flood behaviour;
- Will not adversely impact flood behaviour;
- Will not adversely affect safe occupation of the surrounding area;
- Will implement appropriate measures to manage risk to life in event of a flood; and

The site is only partially affected during the Probable Maximum Flood (PMF).

Flood Impact and Risk Assessment (FIRA) has been prepared by Northrop Consulting Engineers (Appendix W) in consultation with Ryde City Council's flood engineers. The assessment is consistent with the NSW Flood Risk Management Manual (2023), Council flood policies, and the Secretary's Environmental Assessment Requirements (SEARs). It defines existing flood behaviour, applicable Flood Planning Levels (FPLs), and appropriate mitigation measures.

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**Appendix U**

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- Will not adversely affect the environment or cause avoidable erosion.

The site is influenced by regional flooding from the Shrimptons Creek catchment, with the most significant flooding occurring within the surrounding road network, particularly at the Cottonwood Crescent / Waterloo Road sag. Council Flood Information Certificates and the Flood Harmonisation Study (WMAwater, 2025) confirm the site lies outside the 1% AEP flood extent and is only partially affected during the Probable Maximum Flood (PMF), resulting in a Low Flood Risk classification. Minor overland flows from Elouera Reserve and Lachlan Avenue are limited and are not identified by Council as formal flood paths.

Flood Planning Levels have been established in accordance with Council's Stormwater and Floodplain Management Technical Manual. All habitable floor levels, basement entries and critical infrastructure are protected to the higher of the applicable road verge levels, relevant 1% AEP allowances, or the PMF. Where basements are located below flood levels, bunding and flood protection measures are provided, and flood-compatible materials are used below the FPL.

Flood risk is managed through a shelter-in-place approach, with internal refuge areas located above the PMF. Evacuation remains possible for events up to the 1% AEP, with no reliance on evacuation during extreme events.

Hydraulic modelling confirms the development will not adversely affect flood behaviour beyond the site. The site is not within a floodway or flood storage area, and the absence of on-site detention results in only a negligible increase in local overland flows, with no impact on adjacent properties or public safety.

**6.1 Acid Sulfate Soils** Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been—

- (a) prepared for the proposed works in accordance with the Acid Sulfate Soils Manual, and
- (b) provided to the consent authority.

Spatial Viewer identifies the majority of the site is classified as Acid Sulfate soils.

A Geotechnical Desktop Study has been prepared by Douglas Partners and is provided at Appendix L. The report recommends further testing during geotechnical and contamination investigations is recommended to better quantify the risk and the need for an acid sulphate management plan.

## Apartment Design Guidelines

ADG Design Criteria	Assessment
<b>Public Domain Interface</b>	<b>Complies.</b> The proposed towers have wintergardens with direct look to the street and surroundings, the town houses proposed facing the Elora Reserve have access to Waterloo Road. In addition, public open spaces are designed on the Level for for easy access to all future residents.
<b>Solar Access (min 70%)</b>	<p>The proposal generally complies with the ADG solar access requirement.</p> <p>Waterloo Tower achieves 67.1% compliance, and Cottonwood Tower achieves 69.2%, resulting in an overall compliance rate of 68.15%, which is marginally below the 70% target.</p> <p>The minor shortfall is primarily due to 15 apartments (approximately 1.8% of the total) located on the upper levels of Waterloo Tower that have a southerly aspect to capture significant CBD and Harbour Bridge views. While these apartments receive limited direct mid-winter sunlight, they benefit from high levels of daylight, elevated outlook, and premium visual amenity.</p>
<b>Natural Cross Ventilation (min 60%)</b>	Justification proposed for non-compliance. 57% of apartments achieve cross-ventilation. In addition, all upper-level apartments incorporate wintergardens that are permanently open to a minimum of 15%, enabling enhanced natural ventilation

performance. Collectively, the design intent meets the objectives of ADG cross-ventilation provisions. This is discussed further in the EIRS at **Section 8.4.3**.

<b>Universal Design (min 20%)</b>	Complies. A minimum of 20% of apartments are designed to meet adaptable / universal design principles, providing accessibility and flexibility for occupants across varying mobility needs.
<b>Deep Soil (min 7%)</b>	421m <sup>2</sup> (8.2%) of the site area is provided as a Deep Soil Zone with minimum dimensions of 6 metres.
<b>Communal Open Space (min 25%)</b>	Justification proposed for non-compliance. A total of 536m <sup>2</sup> of consolidated communal open space is provided at Level 1, a total of 13.6% of the site area. Over 50% of the principal usable area receives at least 2 hours of direct sunlight between 11:00am and 1:00pm at mid-winter. The space is well-defined, centrally located and directly connected to internal communal facilities at level 1. The space is supplemented by these substantial internal amenities which measure 836 in area across the full level 1 floor plate. Further discussion of this is provided in the EIRS at <b>Section 8.4.1</b> .
<b>Private Open Space</b>	Private open space meet or exceed minimum ADG requirements, are directly accessible from living areas and have a functional area and configuration conducive to recreational use.
<b>Building Separation</b>	Complies. The development provides a habitable-to-habitable separation distance of 18 metres between to towers.
<b>Ceiling Heights</b>	Complies.
<b>Apartment Size and Layout</b>	Complies. All apartments exceed the minimum internal area requirements set out in the Apartment Design Guide. Minimum apartment sizes of 35 m <sup>2</sup> for studios, 50 m <sup>2</sup> for one-bedroom, 70 m <sup>2</sup> for two-bedroom, and 90 m <sup>2</sup> for three-bedroom apartments have been achieved or exceeded.