

COUNCIL ADVICE

Pre- EIS – SSD CONSULTATION

PROPERTY:	15-21 Cottonwood Crescent, Macquarie Park	
MEETING DATE:	29 January 2026	TIME: 10:00am
COUNCIL REFERENCE:	PRL2025/60	
DEVELOPMENT:	State Significant Development Application and concurrent rezoning to allow higher density residential development.	

SSDA Development Proposal

- Residential development comprising two (2) residential flat buildings with 870 dwellings, of which 10% of the uplift of the dwellings (62 dwellings) will be for future affordable housing units
- Height: 60 storeys / 205.5m (currently 65m),
- Proposed FSR: 14.5:1 (currently 4.5:1)
- GFA: 74,385 m² of GFA.
- 10% affordable housing of the uplift proposed.
- Landscaping: 2,794 m² of landscaping across the site (53% of the site), which comprises 5% additional landscaping than approved under LDA2024/0158.

Rezoning Proposal

A concurrent Rezoning seeking to amend the maximum building height and maximum floor space ratio (FSR) to facilitate the development specified in the EOI declaration.

- Proposed building height: 205.5m (currently 65m)
- Proposed FSR: 14.5:1 (currently 4.5:1)

ATTENDANCE:

Council:

Sanju Reddy
Terry Agar
Robert Platt
Jerard Tungcab
Amir Musabi
Adam Hamawi
Ashan Jayakody
Zelaya Z
Jeremy Giacomini
Terence English

Senior Coordinator Development Advisory Services
Senior Strategic Planner
Development Contributions Coordinator
Development Contributions Officer
Senior Coordinator - Traffic Services
Team Leader Waste
Public Domain
Urban Design
City Architect
Landscape Architect

Proponents:

Trevor Jolly
Mark Gazy
Mobina Shadi
Reece Woodhams
Saul Moran
David Hoy
Donnovan Sia
Travis Lythall
R Lucero
Tim Field

Legacy Property
AJC
Urbis
Place Design Group
Billbergia
Urbis
Billbergia
Urbis
Billbergia
Place Design Group

NOTES FOR PROPONENTS – General Consultation Meeting

The Application is proposed under the State Significant Development Pathway with the Department of Planning Housing and Infrastructure. This advice serves as a record of meeting with Council. Council's consultation and comments are limited and based on a brief presentation of preliminary details by the applicant pertaining to the SSD proposal. It is expected that further consultation will occur once the proposal is further developed. The comments will assist the applicant in the preparation of Environmental Impact Statement (EIS) and detailed design documents.

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 SITE

The site comprises of 4 parcels (refer Figure 1 below) with overall land area of approximately 5,130m². Currently the sites have RFBs, 4x 4-storey walk-ups with ground level parking.

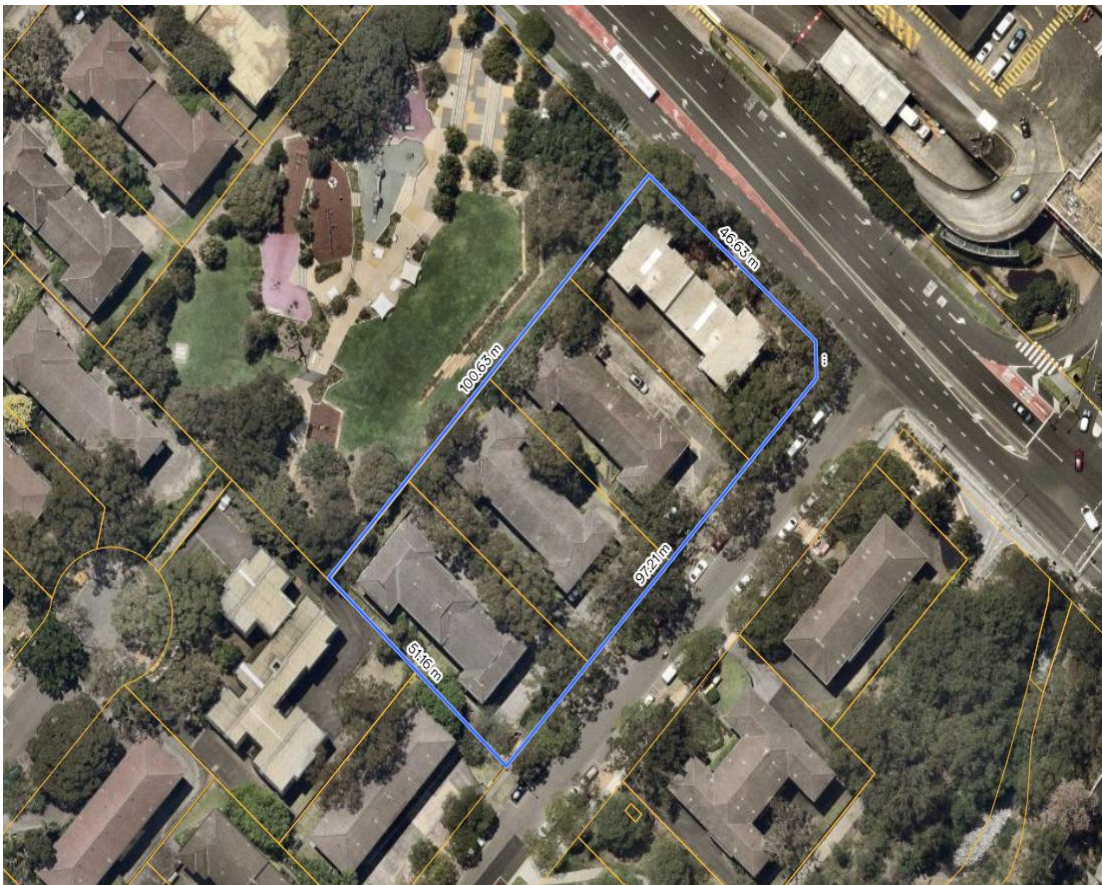


Figure 1: Site aerial view (Sourced Nearmap image taken 6/11/2024)

THE PROPOSAL (as submitted for review)

The architectural plans referenced date 2/12/2025 were reviewed for this advice.

Some extracts of the plans are shown below:

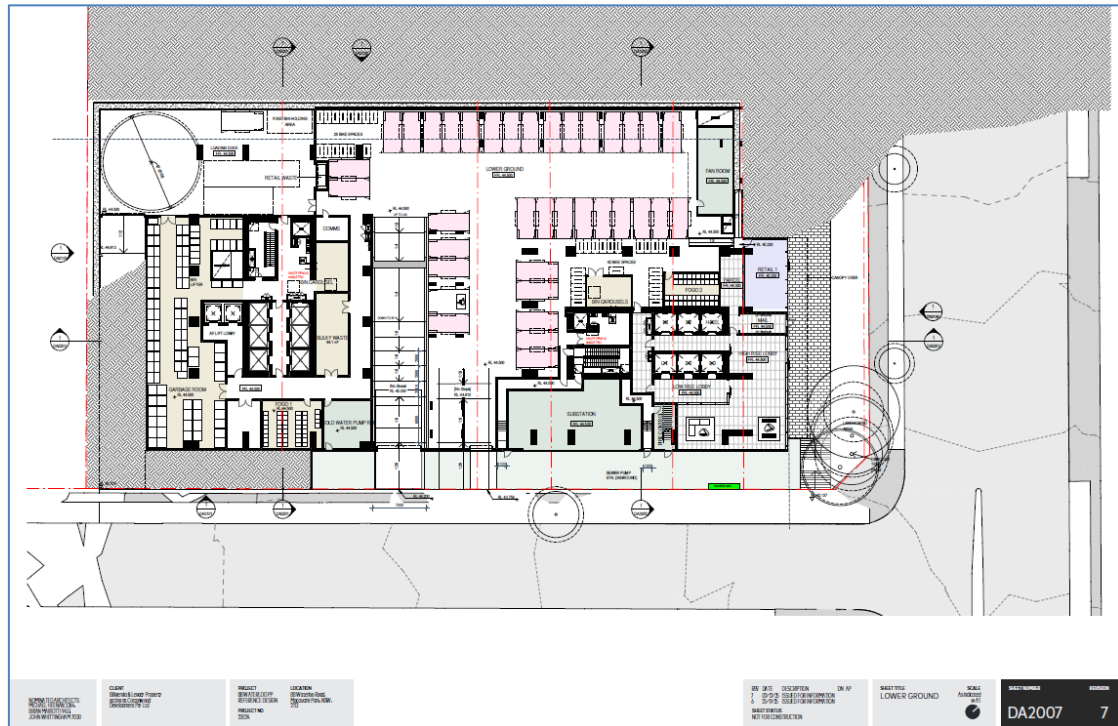


Figure 1: Lower Ground Plan - Source: AJC

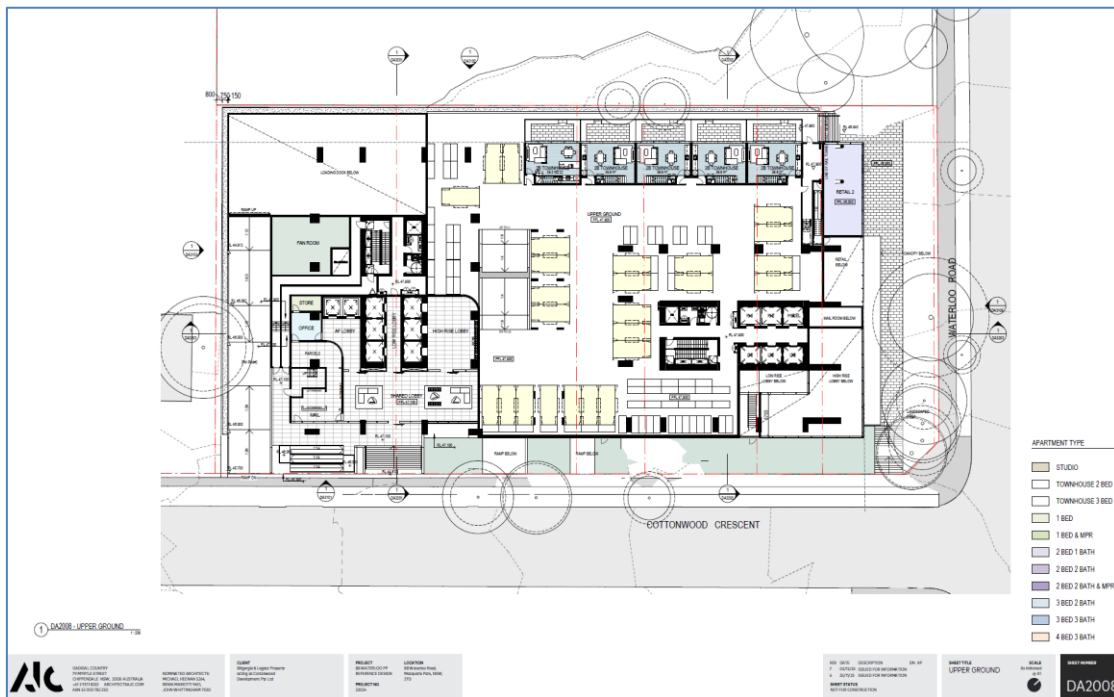


Figure 2: Upper Ground Plan - Source: AJC

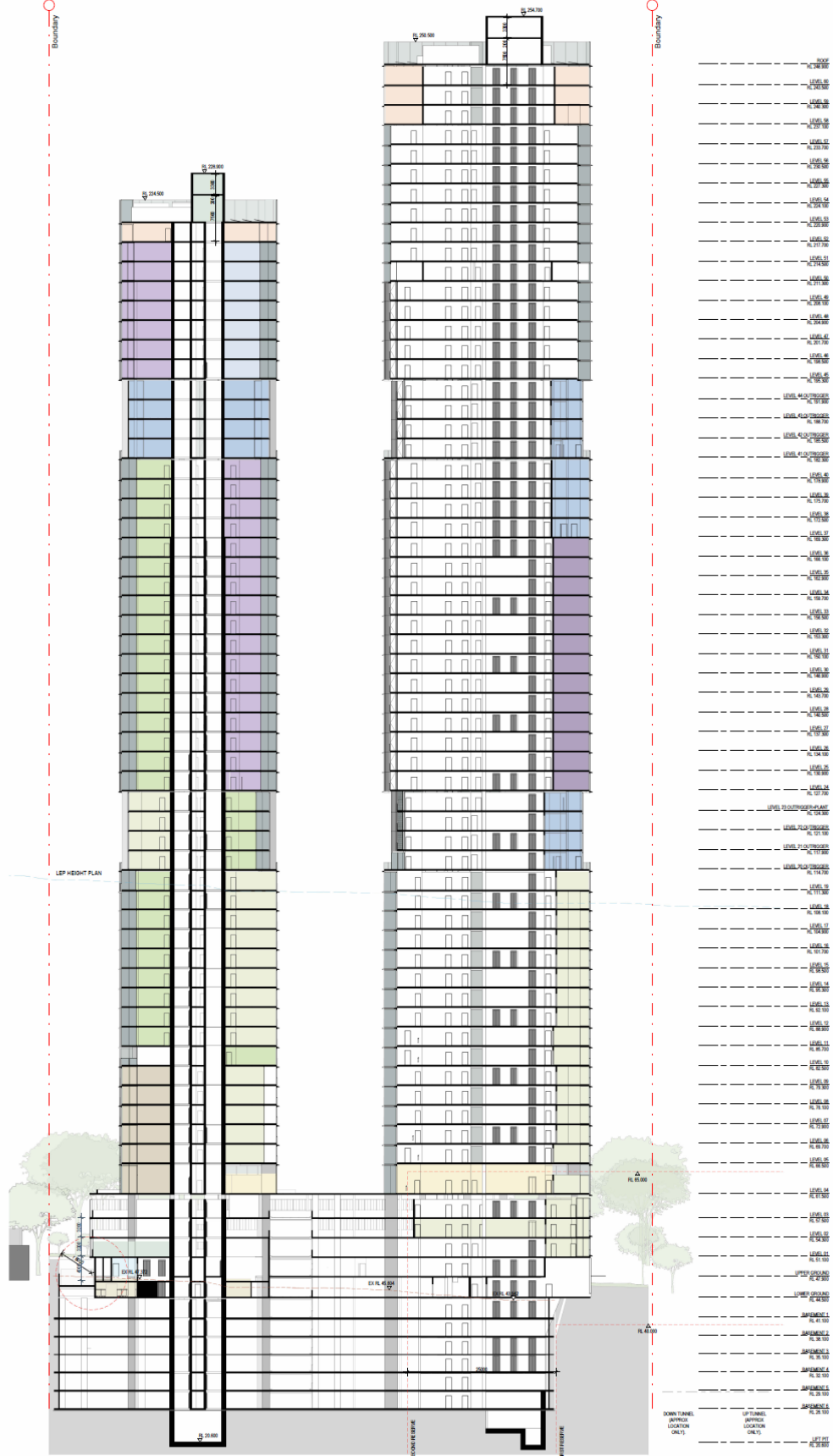


Figure 3: Section - Source: AJC

APPLICABLE STATUTORY PLANNING CONTROLS & POLICIES

Applicable Environmental Planning Instruments & Other Planning Controls

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.

Environmental Planning and Assessment Regulation 2021

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

State Environmental Planning Policy (Planning Systems) 2021

The development is prescribed as being SSD under Clause 26A (In-fill Affordable Housing) of Schedule 1 of the Planning System SEPP. DPHI will be the consent authority.

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), which include Clauses 2.119, 2.120 and 2.122. The development shall be designed with regard to these Clauses, particularly Clause 2.120 relating to noise and vibration.

State Environmental Planning Policy (Sustainable Buildings) 2022

The development will trigger the requirements of SEPP (Sustainable Buildings) 2022. The EIS should demonstrate compliance with Chapter 2 of the SEPP. A BASIX Certificate is required to be submitted addressing the residential component of the development.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 Vegetation in non-rural areas

It is understood that the proposal involves the removal of several trees on the site. The EIS is required to address Chapter 2 – Vegetation in Non-rural Areas.

Other Statutory Planning Controls & DCP

The following planning & building controls are identified as applicable to the development:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
 - *Chapter 4 Remediation of land*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
 - *Division 17 Roads and traffic*
- *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*

RYDE LEP 2014

Zoning and Permissibility

The site is zoned MU1 Mixed Use under the provisions of the Ryde Local Environmental Plan 2014. Development for the purpose of a mixed-use development, retail premises, shop top housing and residential flat buildings are permissible in the zone.

The EIS is required to address the objectives of the MU1 Mixed Use zone.

Height of Building

Under Clause 4.3 of the RLEP, the site is mapped as having a maximum building height of 65 metres. The concurrent planning proposal seeks to increase the maximum building height to 205 metres. Refer to comments regarding strategic merits of the proposal.

Floor Space Ratio

Under Clause 4.4 of the RLEP, the site is mapped as having a maximum permitted floor space ratio of 4.5:1. The concurrent planning proposal seeks to increase the maximum floor space ratio to 14.5:1. Refer to comments regarding strategic merits of the proposal.

Stormwater Management

RLEP 2014 Clause 6.4 applies to the development. Council's detailed Stormwater Management advice is contained in the Comments section below.

Comments/issues raised by Council Staff

A pre-EIS meeting was held with Council on 29 January 2026 and Council's preliminary comments to the proposal are provided below.

These comments and issues being raised needs to be addressed by the Proponent 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 comments/ issues.

The following matters are included for the proponent's consideration:

- *The 7.12 Plan does not anticipate or address the level of infrastructure demand that will be generated by the proposed development. The local infrastructure demand generated by the additional 870 dwellings on this site cannot be addressed through the payment of a 7.12 levy alone.*
- *Strategic Merits of the proposal/ rezoning*
- *Infrastructure Impact Analysis*
- *Development Contributions*
- *Social Impact Assessment*
- *Voluntary Planning Agreement (VPA)*
- *Waset management Issues*
- *Urban Design/Architect*
- *Oversahdowing*
- *Setbacks, deep soil zone, landscaping*
- *Traffic*
- *Parking*
- *Drainage*
- *Development Engineering*
- *Public Domain*
- *Waste Management*
- *Trees and Landscaping*

A pre-EIS meeting was held with Council on 29 January 2026 and Council's preliminary comments to the proposal are provided below.

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1. Strategic Consistency

It is unclear how the applicant has arrived as their proposed Heights and FSR's based on the current existing or proposed strategic framework. The subject site is not identified as benefiting from any increasing in height of FSR in any of Council's or DPHI's adopted strategic policies. In addition, the subject site is not identified as being within Macquarie Park Corridor, for the purposes of Clause 6.9 (now part 7) or any of the Departments rezoning of Macquarie Park. The site is located within the Herring Road Activation Precinct, which around 2012-2016

went through a state rezoning process and received uplift to the current controls under the RLEP 2014. The proponent is seeking to further increase the height and FSR, this highlights that the applicant's proposal is an out of sequence rezoning that is not responding to any changing strategic planning landscape.

A detailed strategic and site-specific assessment is required with the planning proposal, including assessment against the 9.1 Ministers Directions.

2. Voluntary Planning Agreements/ Development Contributions

The 7.12 Plan does not anticipate or address the level of infrastructure demand that will be generated by the proposed development. The local infrastructure demand generated by the additional 870 dwellings on this site cannot be addressed through the payment of a 7.12 levy alone. The following comments and issues are offered that applicant should address.

- a. The Macquarie Park Corridor Section 7.12 Contributions Plan 2025 (7.12 Plan) was prepared by the Department of Planning, Housing and Infrastructure and adopted by Council on 29 April 2025. The Minister for Planning and Public Spaces amended the EP&A Regulation 2021 to facilitate a levy of 4% on residential development which will apply to this application. A detailed quantity surveyor report must be provided to Council.
- b. Notwithstanding the above, the 7.12 Plan does not anticipate or address the level of infrastructure demand that will be generated by the proposed development. The local infrastructure demand generated by the additional 870 dwellings on this site cannot be addressed through the payment of a 7.12 levy alone.
- c. The application must identify and address the anticipated infrastructure demands of the proposal. Reference should be made to the provision rates in Council's Local Infrastructure Strategy 2024 and include consideration of cumulative impacts, particularly for open space and recreation facilities.
- d. The application proposes a 300% increase to the permissible height and FSR on the site. The NSW Government's recent rezoning of the Macquarie Park TOD Precinct facilitated increased development capacity in 13 key sites. The increase in permissible GFA on these sites ranged from 120% to 253%. This additional yield can only be accessed if specific additional open space, access infrastructure, and affordable housing is provided on the site. The open space provision on key sites is an average of 20% of the uplift. This infrastructure is identified in Part 7 of RLEP and is in addition to the 7.12 levy for local infrastructure.
- e. The NSW Government's rezoning was informed by economic analysis to balance feasibility with an appropriate level of infrastructure provision. This application seeks significant uplift that is similar in nature to the key sites and should include similar infrastructure considerations.
- f. In 2024, initial discussions with Council on a draft VPA for the site demonstrated that an additional public benefit valued at approximately \$86,000,000 could address anticipated infrastructure demands. This

should also be considered as part of a SSD application to address infrastructure demands.

- g. The application indicates affordable housing based on 10% of the uplift (62 dwellings). Affordable housing should be based on total dwellings and must be provided in perpetuity. This should be provided as 10% on the overall residential floor space and provided in perpetuity.

3. Lack of Strategic merit for increase in Building Height/ FSR

The RLEP2014 permits a maximum building height of up to 65m. The SSD proposal seeks a building height of 205.5m which is over 200 percent increase in height. Similarly, the proposed quantum of GFA (over 300 percent increase), is much higher than the anticipated scale of development on this site based on the existing available infrastructure, the RLEP2024, the Development Contributions Plan and the Herring Road Activation Precinct.

The prelodgement consultation package did not provide any details in regard to this matter even though this was raised as part of the previous preliminary meeting.

The site is located outside the Macquarie Park Stage 1 and Stage 2 rezoning boundaries. The proposal seeks a maximum building height of 205.5 m, which substantially exceeds both:

- the tallest building currently approved in Macquarie Park (Trilogy by Meriton), and
- the future height framework envisaged for identified key sites within the Macquarie Park TOD Precinct.

There is no strategic basis or policy alignment to justify the proposed height or density on this site without provision of commensurate infrastructure.

In the Macquarie Park rezoning recently adopted, any potential future height incentives are only possible if significant public benefits—including new open spaces, public roads, pedestrian link, infrastructure upgrades etc are provided by the applicant. Relative to the built form outcomes and public contributions expected from the identified key sites in the Macquarie Park rezoning, the proposed scale and intensity of development on this comparatively small site is not appropriate. Council also holds significant concerns regarding the absence of the necessary transport, social, recreational, educational, and other infrastructure required to support the level of density proposed. It is sought that the building height and proposed GFS be reduced significantly.

Key concerns were:

- Justification of the level intensification
- Precedent setting in the locality
- Infrastructure capacity impacts by the development and cumulatively in the long term
- Height impacts of overshadowing and aviation movements
- Basement impacts on Metro corridor

The rezoning proposal should address the Strategic and Site-Specific merit of the development.

Describe how the proposal aligns with Regional and District plans

- Greater Sydney Regional Plan
- North District Plan

Describe how the proposal aligns with the Local strategic planning framework

- Macquarie Park Innovation Precinct Place Strategy
- Macquarie University Station (Herring Road) Growth Precinct study (basis for RLEP FSR and Height controls and delivery of student housing supply).
- Waterloo Road Active Street Masterplan
- Ryde LSPS
- Ryde Housing Strategy
- Ryde Local Infrastructure Strategy

Describe the site-specific merits of the proposal

- Housing provision - especially student housing
- Transport connectivity
- Open space and recreation facilities contributions
- Provision of any additional infrastructure

4. Overland Flow Management

The following must be complied with:

- a. Application needs to demonstrate and confirm that the basement crest level is designed up to the PMF. Cross sections of the basement along the driveway would be required.
- b. Flood impact statement to reflect the following:
 - i. Basement Ramp to raise to PMF level before descending to the basement to ensure basement flood immunity.
 - ii. Please ensure the basement ramps crest levels are above the PMF levels and clearly indicate it on the architectural plans.
 - iii. Any other opening leading to the basement (e.g. emergency exits, vents, etc...) to be located above PMF.
 - iv. Please provide the certificate from the flood engineer that the proposed basement openings are not inundated during PMF flood event.
 - v. The applicant must demonstrate that the proposed development does not adversely affect the flood conditions of neighbouring properties or the downstream catchment. Please explain in the conclusion how the proposed development will not have any adverse flooding impact on neighbouring properties.
- c. Architectural plans to reflect the following:
 - i. A cross section of the basement ramp to be provided and clearly demonstrate that the crest of the basement ramp is designed up to PMF level.

5. Public Domain

a. General Comments:

- i. Two (2) additional driveway connections (total of 3) from Cottonwood Cres are proposed as part of this application. From Public Domain perspective there is no objection, however consideration shall be given for any opportunity to reduce the extent of on-street parking being lost due to the current design.
- ii. Any additional street trees proposed for removal, which were not previously approved in LDA 2024/158 must be referred to Council Tree officers for assessment.

b. Key Considerations:

- i. The applicant is required to submit Public Domain plans addressing the relevant requirements in accordance with Public Domain Technical Manual (PDTM), Chapter 6 – Macquarie Park and Development Control Plan (DCP), Part 4.5 – Macquarie Park Corridor. The plans must include the following:
 - a. Removal of all redundant driveway laybacks along Cottonwood Crescent.
 - b. Road pavement reconstruction: - Cottonwood Crescent: Half-road width, full-depth reconstruction. Waterloo Road: One-lane width, full-depth reconstruction.
 - c. Upgrade of footpaths along both frontages to granite paving.
 - d. Reconstruction of all kerb and gutter along both street frontages. Proposed kerb alignments and profiles must demonstrate appropriate integration with existing infrastructure.
 - e. Upgrade of street lighting – luminaires and columns to be replaced with Multi-Function Poles compliant with AS/NZS 1158 and the Macquarie Park Street Lighting Masterplan. Lighting must be powered by a metered supply.
 - f. Upgrade of the existing bus stop (Stop ID: 2113213) on Waterloo Road to meet DDA compliance requirements.

6. Car Parking and Podium Parking

The proposal includes 695 parking spaces, distributed across six basement levels and five podium levels.

While the proponent states that parking will comply with the Ryde DCP, Council strongly encourages a reduction in provision of parking given the site's proximity to the metro station. Excessive parking generates additional private vehicle use and local traffic impacts—particularly problematic in a proposal seeking such a substantial uplift.

The increase in density has resulted in the proposal showing 3 separate vehicular access points to the site. The presence of two vehicle access points and one loading dock along Cottonwood Crescent poses additional risks to pedestrian movement and safety.

There are several additional issues noted based on a review of the architectural plans:

- i. Under Transport for NSW's Guide to Transport Impact Assessment, the site would likely fall into Sub-Category 1A. The total number of bedrooms

is not given on the plans, but it would be expected that the traffic report would use the data in the Guide to estimate the number of resident parking spaces required, rather than Council's DCP.

- ii. No retail parking spaces are identified on the plans.
- iii. There is a high number of tandem spaces (10%). Such arrangements result in redundant spaces and or conflicts post occupation.
- iv. Some of the accessible spaces do not appear to comply (as there are no shared zone shown).
- v. For visitor parking, the number required for 870 units is 124 using the Guide (1 per 7 units) – if only 24 are proposed, this is a significant shortage.

It is crucial that adequate parking provision in the site be made for visitor parking given the very limited level of on-street parking availability in the surrounding area and the scale of development. An undersupply of parking for residents is aligned with planning objectives for reduced vehicle ownership for residents of that development. The same concept will not apply to visitors to the site.

7. Traffic Comments

The following comments are offered by Council's Traffic Department.

- a. 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:
 - Waterloo Road and Cottonwood Crescent;
 - Waterloo Road and Herring Road; and
 - Herring Road and Windsor Drive.
 - 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.
- b. The applicant is to be required to prepare a preliminary Green Travel Plan to demonstrate how the development will reduce single occupant car trips to the site for the journey to work travel.
- c. 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.

It is also recommended that a preliminary Loading Dock Management Plan (LDMP) be prepared and submitted with the development application. The LDMP should clarify how the loading dock will operate, noting that access is proposed via a one-way, single-lane driveway in conjunction with a turntable. In particular, the LDMP must address contingency measures to ensure the ongoing operation of the loading dock in the event of a turntable failure.

- d. The architectural plans submitted with the pre-lodgement application indicate that two separate vehicular driveways are proposed to provide access to the basement and podium car parks. To minimise the number of vehicular access points, it is recommended that the access arrangements be revised so that a single vehicular driveway is provided,

with access to the basement and podium car parks separated within the site boundary.

8. City Spaces Comments

- a. Solar Impact assessment needs to be made of the proposed development to identify the impact it will have on the surrounding public open space. In the absence of Council having any specific controls, seeking to achieve the controls outlined in the Macquarie Park Urban Design Guide as part of the Transport Oriented Development re-zoning is considered appropriate. This objective should also be sought to be achieved for the communal open space identified within the site.
- b. Amended SSDA application is a very poor outcome in respect to the communal open space as the function the areas provide do not provide a high level of 'break out' passive recreation amenity. Much of the area identified as communal open space is simply connections an access space around the building or used to support the proposed commercial activities.
- c. Any direct access from the Private residents is not supported. Any access to the reserve from the proposal site to the reserve, should be via communal pathways only.
- d. No material should be place on public land to benefit the development (landscape plans show 'flexible stacked sandstone wall treatment'.
- e. Demonstration needs to be detailed that all effort has been made to make the 'linear park area' on the Waterloo road frontage as accessible as can be feasibly achieved.
- f. Area identified along Waterloo Road for setback associated with linear park should not include confirmed space for commercial purpose (i.e outdoor retail space). Use of this area should be confirmed by Council post development following application process. Design of area should allow for use of space as a linear park.
- g. Significant number if trees are schedule for removal, as replacement cannot occur on site a fee will need to be paid by the proponent for replacement plantings to occur at other locations within the LGA.
- h. Any Tree removal that is undertaken on the site should be replaced on a 3 for 1 basis in accordance with the City of Ryde's DCP – Tree Preservation. Should any replacement plantings not be able to be undertaken within the property, a financial contribution is to be made in accordance with the City of Ryde's fees and charges associated with tree planting on Council land.

9. Linear Park – Poor design

The linear Park setback along Waterloo Rd seems to be poorly designed. It is noted that the Linear Park setback has several encumbrances such as steps, retaining walls and several access points to serve only the proposed development. This is inconsistent with the intent of Linear Park.

The Applicant is advised to refer to the Waterloo Road Masterplan and design the linear park in alignment with the recommendations for the 'Forest Zones'. The current landscape concept does not align with the intended character depicted in the Masterplan in terms of the location of footpath and the public domain design.

Weblink: <https://www.ryde.nsw.gov.au/Council/Strategies-Plans-and-Publications/Planning-and-Development-Plans/Waterloo-Road-Masterplan>

10. Social Impact Assessment

Noting the significant increase in dwelling numbers on the site, a **Social Impact Assessment** should be completed which outlines how the additional social infrastructure (parks and community facilities) is going to be provided to meet the needs of the new residents. It is noted the area falls within the Herring Road Urban Activation Precinct and the proposed developed results in a requirement for additional infrastructure above what has been currently considered within Council's current infrastructure plans.

11. Design Comments

a. Tower form configuration

The proposed scheme includes two towers with a minor height variation and an 18 m building separation. Council notes a considerable increase in overall building bulk compared to the previous DA scheme, particularly building depth.

- The Cottonwood tower has an approximate depth of 26 m.
- The Waterloo tower has an approximate depth of 28 m.

These larger floorplates appear to have been maximised to achieve a high GFA. Council is concerned about the resulting impacts on design quality and residential amenity, including:

- reduced solar access for apartments and communal open space,
- limited opportunities for natural ventilation at podium levels.

Council also has concerns regarding potential wind, visual, and overshadowing impacts on the public domain, communal open spaces, neighbouring residential areas, and the broader precinct due to the excessive building height and built form.

A comparison between the previous DA scheme (HOB:65m, FSR:4.5:1) and the SSD proposal (HOB:205.5m, FSR:14.5:1)



Figure 4: Comparison between the previous DA scheme (HOB:65m, FSR:4.5:1) and the SSD proposal (HOB:205.5m, FSR:14.5:1)

b. Setbacks and Public Domain Interface

Varied setbacks are proposed along the western boundary adjoining Elouera Reserve. The podium levels (Level 1- 3) provide setbacks of less than 3 m, which does not comply with the minimum 5 m setback required under the Ryde DCP. It also presents a solid wall as an interface with Elouera Reserve, raising safety concerns that require a CEPTED approach.

It requires design considerations to minimise visual and environmental impacts from podium car parking, and provide better interfaces with Elouera Reserve.

It is recommended that all carparking is located below ground to improve the interface with Elouera reserve.

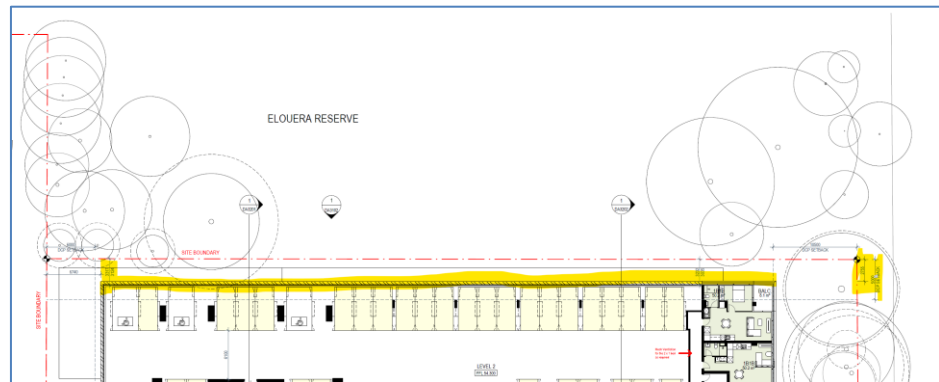


Figure 5: Plan showing Carprking interfacing with the Elouera Reserve

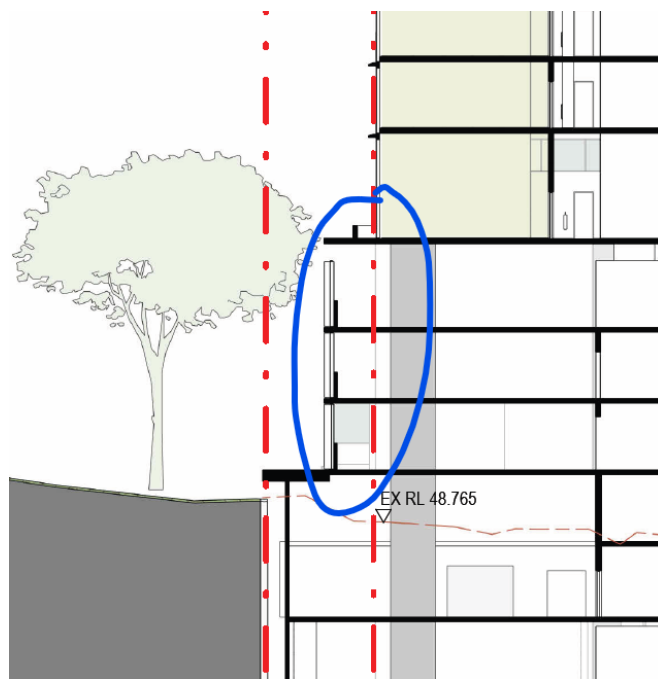


Figure 6: Plan showing Section adjoining the Elouera Reserve

c. Tree retention

Existing mature trees along site boundaries currently provide shade and environmental value. The provided tree removal and retention plan indicates that most trees will be removed. All mature trees should be retained to the street edge at both Cottonwood Crescent and Waterloo Rd. Council requires a detailed arborist report for the removal of any existing mature trees.



Figure 7: Existing trees

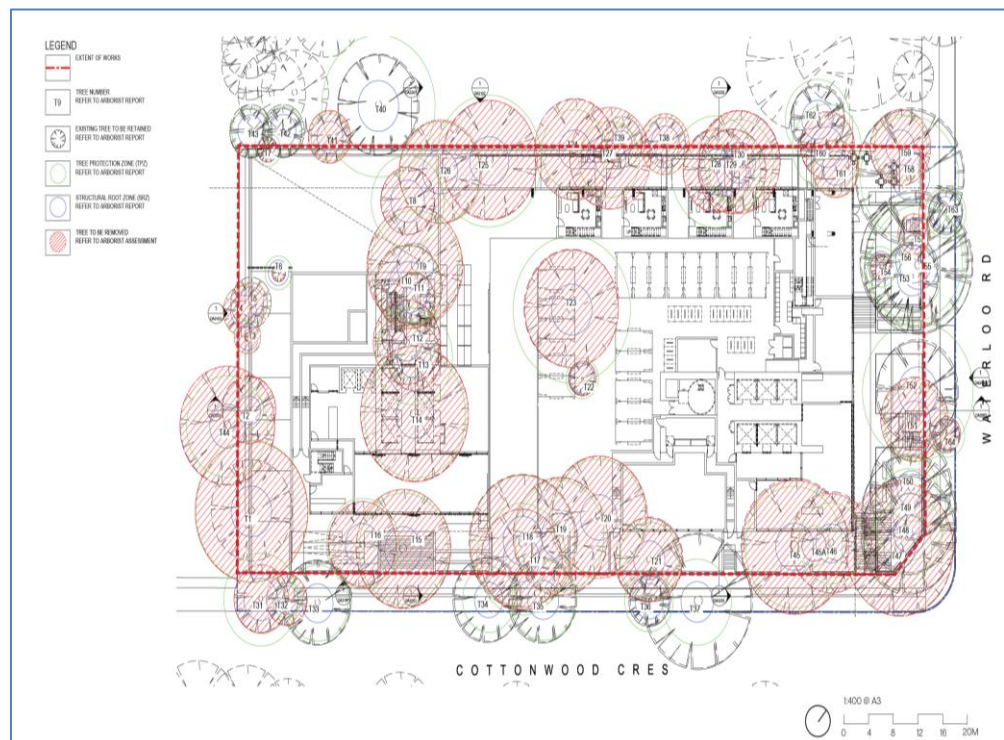


Figure 8: Existing removal / retention plans by Applicant

d. Deep soil zone

The ADG requires deep soil areas with a minimum dimension of 6m at either side, and a total deep soil provision of at least 7% of the site area.

Deep soil zones along Cottonwood Crescent fall within the 5m building setback area and therefore:

- do not meet the minimum dimension, and
- fail to achieve the minimum 7% requirement.

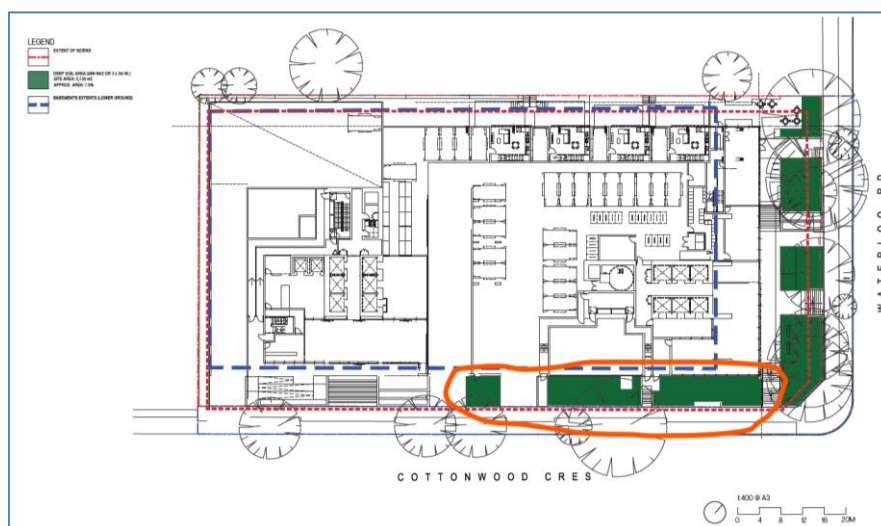


Figure 9: Deep soils Strategy shown in prelodgement Plans

e. Overshadowing impacts

i. Solar amenity of open spaces

No shadow analysis diagrams provided for review. Previous documents demonstrated that a 65m building height produced no additional overshadowing to Wilga Park, while the proposed 205.5m height casts additional overshadowing to Wilga Park from 9:35am – 12:15pm on 21 June.



Figure 10: Shadow 11:00am (65m Scheme under LDA Approved)



Figure 10: Shadow cast by proposed 205m building (SSD)

f. Solar amenity of the neighbouring residential

The proposed 205.5m height results in significant overshadowing of a broad south-eastern area, particularly impacts on:

- the solar access of the balconies and living rooms on the north-western facades of nearby residential buildings, and
- the rooftop communal open space at 82 Waterloo Road, highlighted in the snip below.

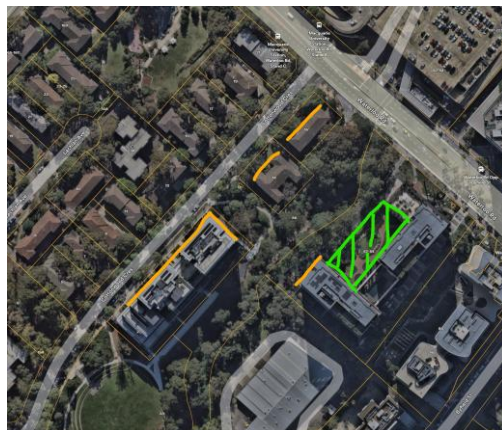


Figure 11: Rooftop communal open space at 82 Waterloo Road

g. Affordable housing

Affordable housing provision should be 10% of the total proposed residential, not limited to 10% of the additional housing, and secured in perpetuity. Affordable housing should be based on total dwellings and must be provided in perpetuity. This should be provided as 10% on the overall residential floor space and provided in perpetuity.

h. Design Recommendations

- i. Revisit the proposed uplift to better align with Macquarie Park's context and strategic role. Consider including non-residential GFA controls to support employment growth and deliver public benefits.
- ii. Reduce building height, bulk and depth and increase tower separation to improve solar access, natural ventilation and

residential amenity as well as mitigating visual, wind, noise and other environmental impacts.

- iii. Ensure compliance with building setbacks controls and provide well-designed interfaces with streets and Elouera Reserve.
- iv. Locate all parking below ground and reduce car parking provision to reflect proximity to the metro station and minimise traffic impacts.
- v. Increase building separation to min. 24 metres (currently 18 metres) to comply with the Apartment Design Guide.
- vi. Revise the layouts to increase the number of ADG compliant cross-ventilated apartments, particularly to the podium levels.
- vii. Ensure that solar access plan incorporates overshadowing impact from one tower onto the other within the site.
- viii. Revise the west-facing two storey 2B 'Townhouse' typologies to the podium, to provide better access to natural light and cross ventilation. Currently these are single west-facing with no light to internal circulation spaces.
- ix. Retain all existing mature trees to street interface (within 6m deep soil zone of the site boundary) enhance site landscaping.
- x. Provide compliant deep soil zones (minimum 6 m dimension, 7% of site area) in accordance with the ADG.
- xi. Provide 10% of total dwellings as affordable housing, secured in perpetuity.

12. Waste Management Issues

Further waste information, including a proposed operational waste management plan is required to provide detailed feedback. The applicant is required to redesign the waste storage and pick area and provide details to demonstrate full compliance with Council requirements. The following would be required:

- a. 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.
- b. Amend the loading dock design to ensure the proposed turntable is unobstructed from bins doors, or support structures. This space must remain clear of all obstructions to support safe and efficient servicing.
 - The proposed turntable shows conflict with a rectangular support structure.
- d. Ensure the site provides:
 - 32 x 1100 litre waste bins collected 3 times a week
 - 80 x 660 litre recycling bins collected 2 times a week
 - 44 metres squared minimum of unobstructed bulky waste storage space.

- 91 x 240 litre food organics bins in anticipation of a Food Organics Garden Organics (FOGO) service.
- e. Provide a minimum 1.5 metre door to support efficient access to bins for servicing and rotation.
 - FOGO waste room shown demonstrate a single doorway.
 - The provision of 1.5m doorways support more convenient access with bin movement equipment and future proof waste room design for larger bins or equipment.
 - f. Provide a bin movement aid (e.g. tug and trailer) and suitable storage beside the waste collection area. The proposed bin movement paths are excessive for the manual movement of bins for servicing.
 - g. Reposition the bulk waste storage area to ensure the doorway opens directly onto the loading bay to support efficient servicing.
 - The distance between the bulk waste storage area and loading area is excessive and exceeds 15 metres increasing risk in manual handling of unwanted large and heavy goods.
 - The proposed loading area cannot accommodate bulk waste to be presented ahead of collection due to a lack of suitable contained space. Additionally, the loading area is shared among commercial tenants.
 - h. Provide a bin decanter and suitable storage beside the waste collection area to empty 240 litre recycling bins into bulk recycling bins for service.
 - i. Provide separate storage for the required number of commercial waste bins. Access must not be through the residential waste room.
 - j. Provide a minimum 5 square metres for the storage of bulky items from the commercial tenants, including furniture and pallets to reduce potential illegal dumping.
 - k. Provide sufficient storage space for the required number of commercial bins based on the intended use as per the EPA's Better practice guide for resource recovery in residential developments 2019. If unknown, generation rates for Food Retail: With Sit Down Area must be applied.
 - l. Consider space for cleaner's storage and recreation areas to prevent use of waste rooms as chemical storage
 - m. Provide an updated waste management plan which reflects the required changes.

13. Visual Impact Assessment

Required but was not provided.

14. Wind Impact Assessment

Required but not provided.

15. Noise & Acoustic Assessment

Required but not provided

OUTCOMES and SSDA Lodgement Requirements

Council thanks the Proponent 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 Proponent 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 Sanju Reddy - Senior Coordinator Development Advisory Services on 9952 8187 or email sanjur@ryde.nsw.gov.au

Yours sincerely

Sanju Reddy
Senior Coordinator
Development Advisory Services

End of advice