

**SSSD-94006708 State Significant Development**  
**Mixed Use Development at 15-21 Cottonwood Crescent**  
**Macquarie Park 2113, City of Ryde Local Council Area**  
**Current Status: Exhibition**

**Introduction:**

This development is an example of the state government's push to increase housing supply by approving developments that would not otherwise conform to local building codes. Specifically, this development intends to be comprised of two towers of 52 and 60 storeys respectively with a FSR of 16.8:1 in a location where maximum building heights range from 16-20 storeys with FSR's of 4.5:1.

The author of this report will demonstrate that not only is this development unnecessary in achieving the aim of fast tracking more housing into the market, but that its impact on the surrounding area which has been purpose built with strict building codes will be catastrophically negative. Furthermore, this report will demonstrate that the environmental impact assessments provided by the developer for this project are based on flawed assessments of the impact it will have on the surrounding area and that these assessments comprise of deliberate deception and blatant misrepresentation.

Please Note: 15-21 Cottonwood is also referred to as 88 Waterloo Road in the reports.

**Pages 1 and 2: Misrepresentation of building density in Macquarie Park**

A common theme in the impact assessment reports is one which asserts that this project is part of the organic growth of increasingly large developments in Macquarie Park and that as a result, buildings considerably higher than current development limits will soon become common. This is blatantly untrue as no other building west of the eastern boundary of the Macquarie Park Development Corridor will be over 22 storeys high.

**Pages 3 and 4: Misrepresentation of Public and Private domain views**

10 "independent" photo assessments of the visual impact on the environment all, with two exceptions, have been taken from far enough away to negate any obvious impact of overshadowing, or have been taken from locations like playing fields and bus shelters where views of a high rise tower would be irrelevant to the people using these facilities.

**Pages 5 and 6:**

Illustrates visually that repeated assertions that impact from 15-21 Cottonwood is mostly low on the neighbouring environment is not based on the impact the towers will have on the buildings immediately adjacent to them.

**Pages 7 to 9:**

Presents the results published on page 40, appendix 4.2, in the Environmental Impact Report of the community survey commissioned in October 2025 in which residents of Macquarie Park overwhelmingly rejected any development larger, or higher, than was possible within the current planning codes.

**Pages 10 to 12:**

Will provide arguments as to why returning the development at 15-21 Cottonwood back to the original DA which approved two towers of 19 and 20 storeys respectively is the only sensible, rational and reasonable course of action.

**Page 13:**

Summary and conclusion:



Figure 71. The proposal with future context envisaged in Macquarie Park TOD Rezoning

Page 34, appendix E, Urban Design and Architectural report

From left to right.

Box 1. these buildings are located on the bus interchange in front of Macquarie Centre. They don't exist, and are not included in the Macquarie Centre redevelopment plans.

Box 2. these buildings are located at 12-16 Byfield St which is an industrial estate with single storey workshops. It is not zoned for residential.

Box 3. the taller towers on the left are outside of the Macquarie Park development corridor, and those on the right are situated on the grounds of the Macquarie Park cemetery and crematorium. They don't exist, or cant be built under current zoning.

Summary: every aspect of every assessment regarding the impact of this development on the nearby community is based on the premise that Macquarie Park will soon be full of comparatively sized buildings to 15-21 Cottonwood and that the density and number of these structures will normalise this development.

This is not possible because the current building code has limited the height of every building west of Macquarie Centre to 16-22 storeys, including those completed, those in the process of construction, and those yet to be built on undeveloped land within the Macquarie Park Development Corridor.

# Blatant misrepresentation of the streetscape on Herring Road

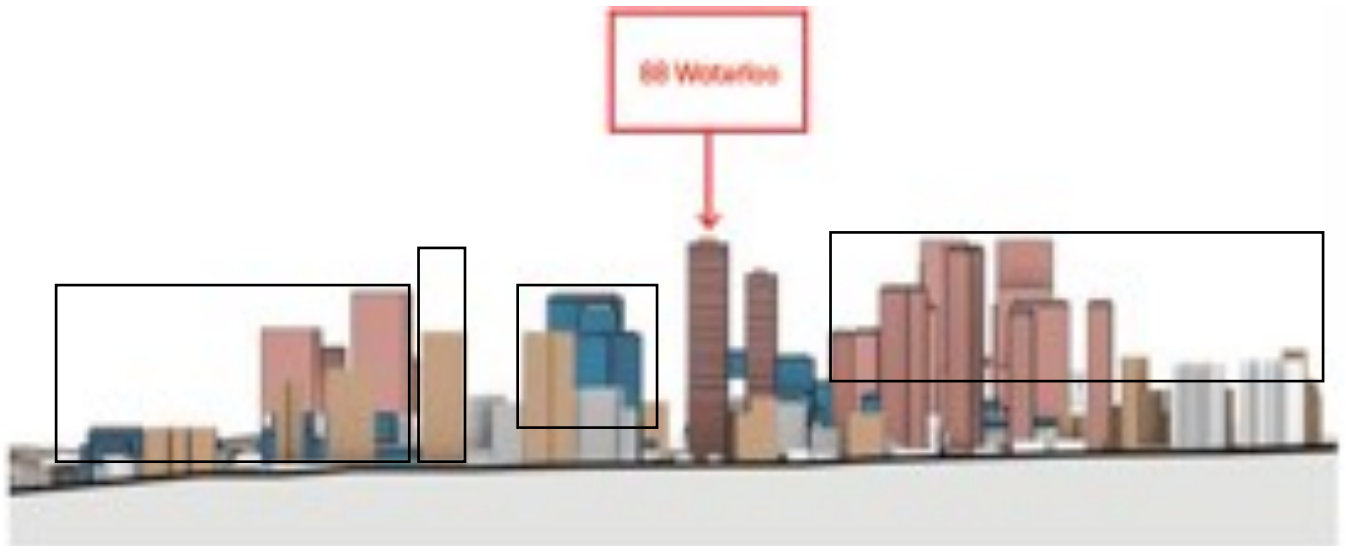


Figure 74. Section B (Herring Road View) Figure 74 Section B (Herring Road View) page 34 Urban design and architect's report Appendix E.

From left to right:

Box 1. these buildings don't exist and never will as they would be located directly on the M2 motorway.

Box2. This building *does* exist. It is Trilogy by Meriton and is the only building in Macquarie Park that is 60 storeys high, or over 22 storeys high.

Box 3. This is the northern entrance to Macquarie Centre. It is one and a half storeys high at this location, nor are there any buildings visible above it.

Box 4. There is not a single development over 22 storeys anywhere on this side of Herring Road built, or approved for development.

Drawn to scale the true streetscape of Herring Road to Epping Road.

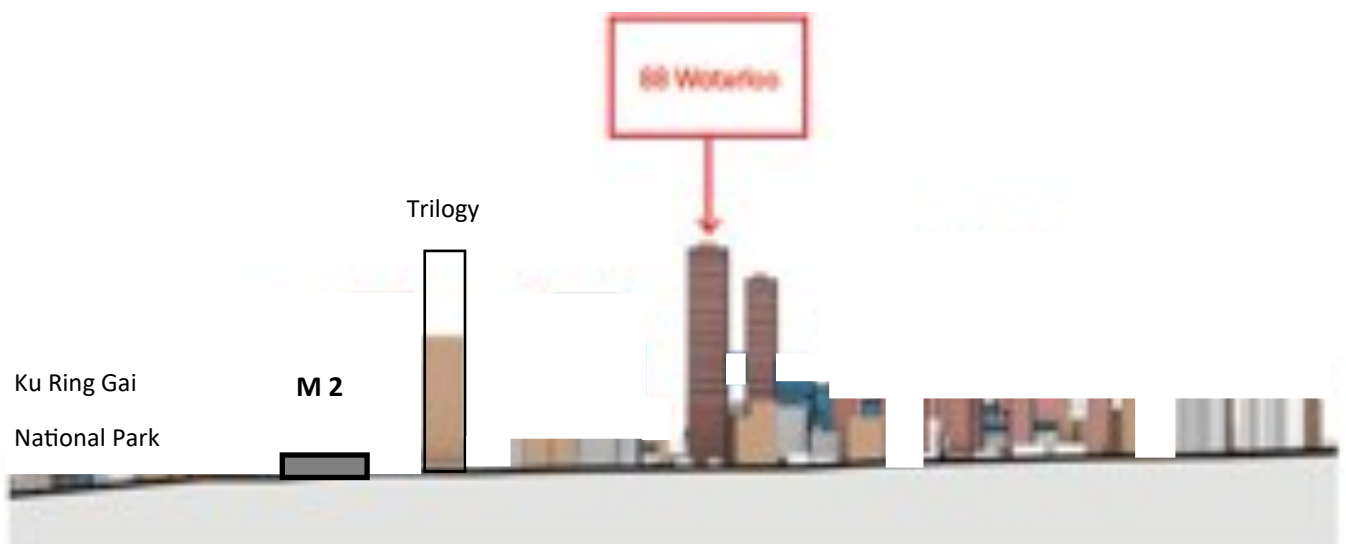


Figure 74. Section B (Herring Road View)

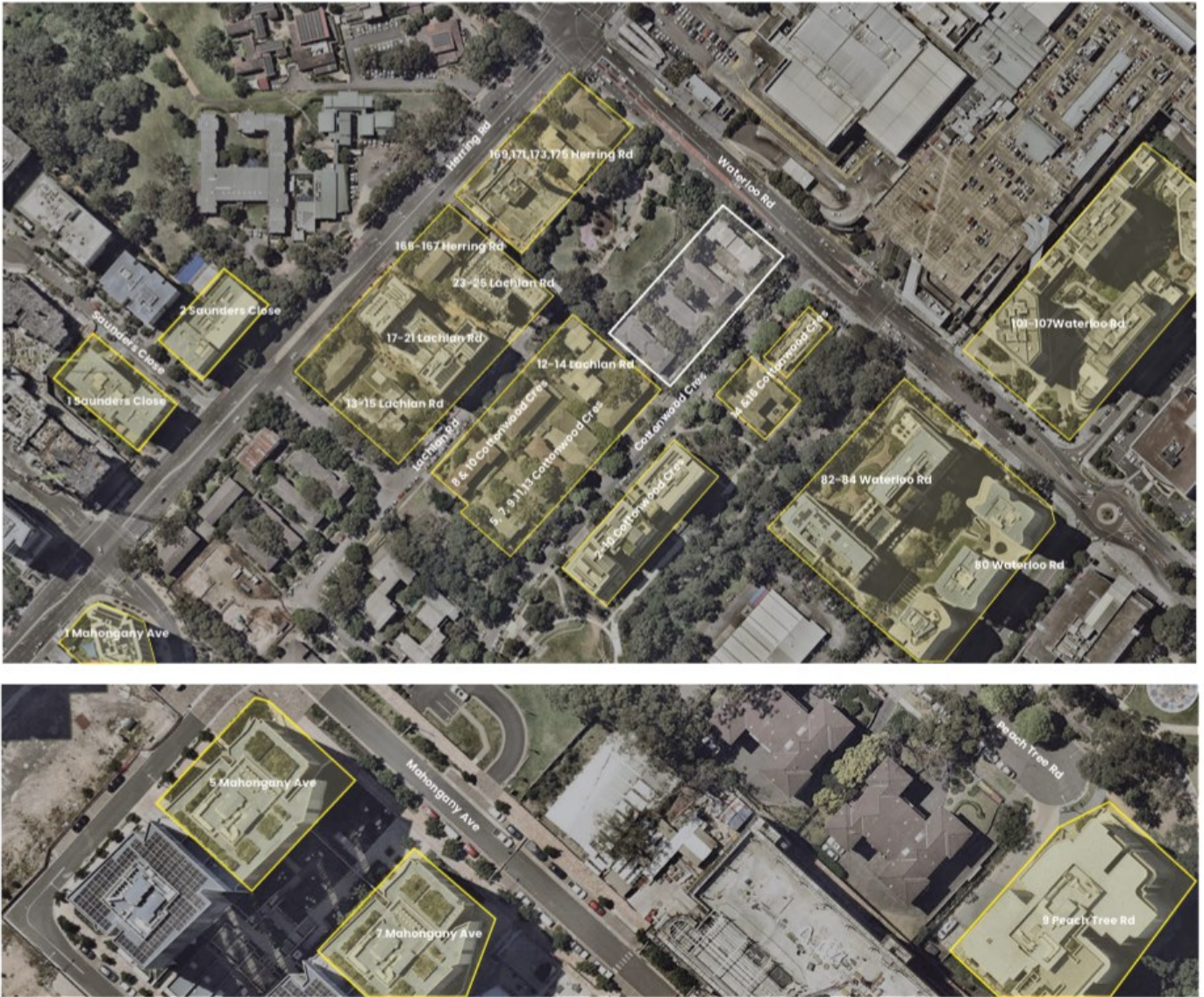


Figure 52 Potential visibility from immediate and surrounding dwellings to part of the proposal

The white box in the upper right is the development site of 15-21 Cottonwood. The yellow boxes identify the building sites of neighbouring developments either under construction, the block size of those able to be developed, or those already completed. Six sites in the upper photo have been completed, with four more currently under construction or almost finished. Every one of these developments are either 16 or 20 storeys high. For the Impact Assessment report to conclude that there is low to medium impact on the nearby environment is farcical. Visually (the report claims other large towers will soon be built near by, thus normalising its initial height impact) overshadowing (significant shadows will impact every building surrounding it due to the path of the sun starting from directly south of the building in the morning (to the right of this picture) and setting north of it at night (top left of the picture) heat and light reflection (the impact report failed the development for this due to projected outcomes on the building's southern neighbours, with no adequate solutions presented) amenities (the park directly north will be in shade until late afternoon).



Public Domain Views • View impacts of the proposal across the visual catchment as a whole have been determined based on fieldwork observations and analysis of 10 accurate, certifiable photomontages prepared by Urbis. • The proposal was found to create low and medium visual effects from close, medium and distant views within the visual catchment. • Overall visual impacts for the majority of views modelled were found to be low. • Visibility to the proposal from across the visual catchment is limited by topography, vegetation and intervening tower development. • In the majority of views, including from sensitive locations such as public parks, the proposal is seen as part of a varied composition characterised by similar tower development. • **The proposal is highly compatible with its existing visual setting and desired future character which anticipates increased density and tower development.**

Private Domain Views • Potentially impacted views from neighbouring dwellings are district views predominantly characterised by vegetation and tower development. Access to scenic compositions in Tenacity terms is limited. • Close, direct views to the proposal from immediate neighbours will change to include foreground development. • Where private domain views from neighbouring dwellings align with the site, the proposal will be viewed as part of a composition predominantly characterised by similar tower development. • High rise dwellings within the visual catchment will potentially align with the proposal where visibility will be limited by blocking effects of surrounding intervening density. • Immediate neighbours will experience some level of visual change where no views of scenic merit in Tenacity terms will be impacted. • Additional height sought above the LEP height control for the site will not cause any view loss of merit in Tenacity terms. • **Private domain impacts are likely to be low and acceptable.**      **Page 52, conclusion of visual impact assessment, appendix H**

Summary: All public and private domain views are considered acceptable due to this tower being one of many that will be built over 20 storeys high, or are already over 20 storeys high, in the area.

Response: there is only one development of this size in Macquarie Park and it is located almost a kilometre away in isolation from the primary development corridor. All other buildings are limited to 16 to 22 storeys as per the building code. As such, the agenda informing the logic of this assessment is based on the incorrect assertion that this proposal is an actual reflection of current and future developments which will normalise buildings of this size in Macquarie Park. It is not. It is an anomaly that will have a severe impact on over nine neighbouring developments within metres from the site.

## 4.2 Community survey summary of findings page 40 Appendix S

An SIA survey was developed to understand the project's potential impacts and the community stakeholders' perspectives on mitigation and enhancement measures. The survey was promoted via a community newsletter distributed to nearby residents and businesses on Tuesday, October 28, 2025, which included a QR code linking to the survey and an invitation to attend a community webinar on Wednesday, 19 November 2025. A total of 605 people viewed the survey, and 248 undertook the survey. Of these, 184 completed the survey. Of these respondents, 97.09% were residents of Macquarie Park, 5.83% were workers or business owners in a neighbouring or nearby property, 6.80% were regular visitors to the area, and 1.46% were residents of a nearby suburb. The responses were read to identify themes for each survey question, and the total number of responses corresponding to these themes was recorded to analyse the responses. Key themes that were raised by respondents in the community survey are summarised in Table 16 below.

Table 14 Community survey thematic findings

### **Theme Description Convenience, Local Access, and Everyday Liveability**

Many survey respondents highlighted the importance of being within walking distance of essential services, including shops, cafés, medical centres, and Macquarie Centre. Respondents valued the area's convenience particularly access to the metro, buses, and employment opportunities, but noted that these systems are increasingly reaching capacity. Several respondents expressed concern that daily amenities could become overstretched without coordinated upgrades, particularly as population density increases.

### **Need to protect green spaces, tree canopy and biodiversity**

Respondents frequently raised the high value they place on local green spaces, native bushland and the tree canopy that contributes to neighbourhood character. Many referenced the importance of Shrimpton's Creek as an ecological corridor and emphasised the need to protect endangered plant species and existing habitat areas. Concerns were raised about overshadowing, heat impacts, loss of natural views and reduced biodiversity caused by dense, high-rise development. Several respondents expressed a desire for enhanced green spaces, green roofs and increased share and recreation opportunities to support wellbeing.

### **Preserving neighbourhood character, scale and visual identity**

Many respondents commented that the existing mix of mid-rise buildings, landscape setback and quiet residential streets contributes to a distinct local identity they wish to retain. Respondents were concerned that proposed building heights, especially towers exceeding 30 to 60 storeys could substantially change the skyline, dominate views, and disrupt the existing balance between the built environment and natural landscape. Some respondents emphasised that the neighbourhood already contains more than enough high-rise development and feared that further intensification would compromise the sense of the place.

## **Community cohesion, safety and cultural identity**

A recurring theme was the areas strong sense of community, with respondents noting multicultural friendly nature of residents and the relationships built with neighbours and small businesses. Some respondents feared that rapid densification could weaken community cohesion, increase transient populations and contribute to antisocial behaviour, especially around metro stations and quieter streets at night.

## **Scale and appropriateness of development**

**Many respondents supported new development in principle but emphasised the need for balanced and appropriately scaled buildings that respected existing neighbourhood character. Respondents generally felt that mid-rise buildings (12-20 storeys) were more suitable for the area than high-rise towers. There was concern that large-scale proposals were driven by developer interests rather than community needs, and that cumulative impacts were not being fully considered. Some respondents expressed support for development only if it delivered meaningful community benefits.**

## **Transport capacity, traffic and accessibility**

Transport pressure emerged as one of the strongest issues. Respondents described overcrowding on the metro during peak times, long waits for buses and heavy traffic congestion along key routes such as Waterloo Road, Herring Road, Talavera Road and Lane Cover Road. Many respondents believed that local roads are already strained and may not safely accommodate further growth. Concerns also included emergency vehicle access, heavy vehicles during construction, reduced visibility at intersections and the need for improved pedestrian and cycling infrastructure.

## **Need for upgraded infrastructure and essential services**

A significant proportion of respondents felt that local infrastructure including schools, childcare, healthcare services, community facilities and parklands is already operating at or beyond capacity. Many stressed that additional housing must be supported by substantial investment in education, healthcare, utilities and public space expansion. Respondents frequently noted that new developments should contribute meaningfully to infrastructure upgrades rather than place additional pressure on existing services.

## **Concerns about noise, construction impacts and prolonged disruption**

Respondents raised concerns about extended construction periods due to the number of large-scale developments planned in the area. Concerns included noise, dust, vibration, heavy traffic and general disruption to residents. Respondents emphasised the need for clear communication, strict construction hours, dust suppression measures and well-managed traffic control to protect neighbourhood safety and liveability.

## **Environmental sustainability and climate resilience**

**Respondents had concerns about transparency in decision-making and whether community feedback would meaningfully influence outcomes. Respondents expressed frustration with perceived developer influence, repeated changes to planning controls and lack of clarity about long-term infrastructure commitments. Many emphasised that the community wants a stable, fair planning framework that prioritises liveability and environmental stewardship. Impacts on vulnerable groups Respondents raised concerns relating to local residents who rely heavily on safe, accessible public spaces and consistent transport. Many felt that rapid intensification would disproportionately impact these groups and called for more inclusive, equitable planning approaches.**

## **Key implications of SIA field study findings page 42 Appendix S social impact findings**

### **Negative findings**

Schools, childcare, healthcare, open space and transport, which many stakeholders consider already at or near capacity.

Concern of the risk of cumulative impacts from multiple developments.

Construction-related impacts such as noise, dust, and traffic disruption.

Concern over reduced pedestrian safety, particularly where construction periods overlap.

Perceived potential for erosion of community cohesion and perceptions of safety associated with rapid densification.

### **Opportunities**

Population growth with community needs

Opportunity through communication to manage community needs

Incorporation of CPTED design measures that support safety and livability

Improved public realm landscaping

Opportunity to implement robust construction management and communication strategies to minimise disruption and maintain community trust

### **Conclusion**

**Respondents wanted: Consistency and predictability with building codes and planning, especially concerning building heights and densification. Improve the consultation process between residents and development. Prioritise community interests and liveability over the interests of developers. Clarity on long-term infrastructure commitments.**

Rejecting App SSD-94006708 is the only reasonable response.

### **Trilogy by Meriton**

The developers report makes several references to Trilogy by Meriton. Trilogy is the only other building in Macquarie Park over 22 storeys high, at 60 storeys. The purpose of these references has been to demonstrate that there is already a 60 storey development in Macquarie Park and thus, the precedent has already been set for building heights taller than the current building code limits. It also explicitly states that as there would be now two towers of 60 storeys in Macquarie Park, that this will become what the new normal will look like, and thus as more larger buildings come online that no single building over 22 storeys will stand out as an anomaly.

Figure 71. The proposal with future context envisaged in Macquarie Park TOD Rezoning, see page 3 in this report

There are two problems with these assumptions. The first is location. Trilogy is located on a land "island" on the very eastern border of the development corridor. It has only one minor residential development near it. Its neighbours are Lane Cove National Park to the east, light industrial to the south, Macquarie University and Macquarie Centre to the north and west. It is also almost a kilometre from the nearest residential development west of Waterloo Road. In other words, it stands in isolation and therefore doesn't have any significant impact on other buildings.

By contrast, 15-21 Cottonwood sits literally in the middle of the most crowded part of the development corridor, where there are eight other buildings metres from each others boundaries.

Secondly, there will not be any more towers higher than 20 storeys any where in Macquarie Park. This because every other DA currently under construction conforms to the building code, or has already been built. The proposed tower at 15-21 Cottonwood will not be the new normal, it will be a singular disaster that ruined the aspects, livability and the value of every property near it.

### **Construction impacts**

The most striking omission from the developers reports was how a development this size could be built over the 8-10 years it would require in a narrow suburban street with extremely limited access and limited street parking without causing chaos for residents also needing to use the roads. One obvious casualty during construction would be the child care centre located on the opposite side of the street to this development. The original DA for two towers of 19 and 20 stories with only three basement levels below ground, as opposed to six and 60 storeys, would obviously be completed in less than half the time, thus halving the impact of construction at this site.

## **Selling out existing owners and destroying confidence in future property purchases and development in Macquarie Park**

The master plan of Macquarie Park by Ryde council took decades to develop. The Development Corridor was an initiative designed to provide quality housing for residents in what had become the fourth largest CBD in Australia. At the heart of it was the principle that each development provide green spaces, access to natural light and didn't cause overcrowding, which included a cap on height and FSR to ensure this occurred.

The spirit of the state government's rezoning legislation was to identify opportunities to rapidly increase housing supply when land and location were identified as suitable. It was never intended to cause more harm than good. This proposal sells out owners who purchased their properties in proximity to 15-21 Cottonwood believing their views, aspects and immediate environment would be consistent with current building codes. The value of these properties are estimated to drop by 10% due to the impact of the construction and completion of this development.

Furthermore, the developer reports do not address how such a large project as this can realistically be built without widescale disruption on the surrounding area due to extremely limited access to Cottonwood Crescent and restricted street parking. Nor would it be possible for a development of this size to proceed while other developments were underway in the immediate area. This equates to a situation whereby once 15-21 Cottonwood starts construction, then all undeveloped sites between Cottonwood Crescent and Windsor Drive would be unable to start until 15-21 was finished. In other words, it could potentially delay the equivalent number of properties coming into the market as it produced.

In this regard, what if the undeveloped land directly west of 15-21 Cottonwood is never sold due to being undesirable? Who would build or buy property zoned to 16 storeys literally on the boundary of a 52 and 60 storey mega development? Thus, it is entirely probable that the impact of 15-21 Cottonwood will prevent more property from being built than it supplies.

## **Current status of supply in Macquarie Park**

There are two main zones within the Macquarie Park development corridor which are East of Peachtree Ave (which includes Cottonwood Crescent) and West of Peachtree Ave. The sector to the West has three completed towers at the northern boundary, and Ivanhoe Estate to the south which is branded as Midtown. Midtown is the largest single development in Macquarie Park and is currently under development to produce 3300 units, which includes 950 social housing options, 130 affordable rental units and a new school.

This development is unique in that all four residential towers are surrounded by parkland and open green spaces, as is the school. All residential buildings are 22 storeys, with the last towers expected to come online in 2026. The proposed towers at 15-21 Cottonwood are only 250 metres from Midtown at the closest points, which guarantees that they will dominate the skyline of most of the estate, thus diminishing the central purpose of the master plan of Midtown to feature trees and parkland, a plan that would be totally inconsistent with 60 storey towers dominating its skyline generally and northerly and easterly views specifically.

## **Local Infrastructure**

An overwhelming number of respondents in the recent community survey of Macquarie Park believed that current infrastructure was already stretched, or running at capacity. The Metro, for example, is at capacity during peak hours, with passengers commuting to the CBD at Chatswood frequently unable to get on.

The promised bus depot at the corner of Herring Road and Waterloo Road designed to eliminate the current bottle neck of vehicles traveling east caused by the merge of cars and busses into the same lanes has yet to have either a start date, or completion date. This is the same intersection cars from the 733 spaces that 15-21 Cottonwood will create that will have to travel through to get to Lane Cove Road, one of the two main arteries out of Macquarie Park.

## **Increased Traffic**

Macquarie Shopping Centre located across the road from Cottonwood Crescent is currently experiencing an exponential increase in traffic use as well, with weekends frequently seeing more cars on the roads surrounding Cottonwood Crescent than peak hours during the week.

Ironically, local council mandates that all new developments have reduced ratios of car spaces relative to numbers of units. Yet, this development will add 500 new car spaces more than the previous DA was going to create on this site.

## **Construction time required for 15-21 Cottonwood**

It is ironic that while the proposed 52 and 60 storey towers are built, it will not be possible for any other projects to begin construction in Cottonwood Crescent or in the surrounding streets on undeveloped land due to the limited space available in this area for trucks and machinery. The original DA, as previously mentioned will take far less time to build and will thus allow scope for the rest of Cottonwood Crescent, Lauchlan Ave and Peachtree Ave to be developed sooner as they all share the same two access points in and out of the area.

# Conclusion

## Macquarie Park Corridor, Ryde Council Master Plan

"The key objectives of the Master Plan are to guide the quality of future development and to implement the vision for Macquarie Park and the Government's strategic objectives of integrating land use and transport, reducing car dependency and creating opportunities for employment in areas supported by public transport"

Central to the plan was ensuring adequate levels of green space and natural light while limiting building heights and maintaining consistency with FSR's and building density. The purpose of this was to not just provide housing for the areas growing demand, but to create a community that residents wanted to live in. The proposal for 15-21 Cottonwood sits in opposition to every aspect of the master plan and local building codes.

### The need for more housing supply

Sydney urgently needs more supply of general and affordable housing, especially around transport hubs. The state government's new rezoning legislation is designed to help create this supply by overturning existing building codes. However, this legislation does not insist this happens at any cost. Currently, the LGA of Ryde, and the suburb of Macquarie Park in particular, has met and exceeded all requirements of local councils to ensure supply of housing. There is no need to bulldoze a development through which is completely at odds with current building codes when the current strategy is successfully meeting current, and future supply demands.

### Precedents

The developer for 15-21 Cottonwood has stated explicitly that if this development is allowed to be built, it will set a precedent for other towers to exceed the current building codes and that this is expected to become the new normal. The obvious question is how many other undeveloped lots of comparable size in Macquarie Park will also ask for exemption from the current building codes based on the new rezoning legislation? The answer will be all of them, of course, due to the profit this would generate.

### The future

The proposed DA for 15-21 Cottonwood of 52 and 60 storey towers places the future of the vibrant and forward looking community of Macquarie Park at a crossroads. Legislators can choose to support the master plan to its conclusion, ensuring quality of life and community is prioritized over developer interests and short term band aid solutions. Or, they can release the development Genie out of the bottle by allowing organisations with no empathy for local needs to overturn carefully prepared local policy, developer interests over the community's, or short term initiatives over long term solutions. On behalf of the residents on Macquarie Park, please reject this development in favour of the original DA.