

18 September 2023

Our Ref: 23-003

Anthony Witherdin
Director – Key Sites Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Submitted online via Major Projects

Town Planning Submission

North Ryde Station Precinct SSD-5093-MOD 6

1. Introduction

This submission has been prepared by Knight Frank Town Planning on behalf of the Wicks Road Landowner Group (herein referred to as 'The Landowner Group') in response to the exhibition of the North Ryde Station Precinct, Department of Planning and Environment reference SSD-5093-Mod-6.

The Landowner Group consists of the owners of properties in North Ryde defined by Wicks Road, Epping Road, and Halifax Street. The precinct is approximately 6 hectares in area (see figure 1). These landholdings are collectively referred to as the Wicks Road Civic Quarter (Civic Quarter).



Figure 1 – Wicks Road Landowner Group, Source: Wicks Road Civic Quarter

2. Key Matters

Overall Character and Form

We note and generally support consolidating the broader role of the Lachlan's Line / Wicks Road precinct as a location well suited to a higher density mixed use neighbourhood. In doing so however, we note the significant increase in height and density particularly its distribution along the common boundary with the Civic Quarter. The Table below details the increase in floorspace of Building E as considered against the original concept approval and the floor space ratio development standard within the Ryde LEP 2014.

| Lot | Building | RLEP 2014 FSR | Original SSD 5093 | Modification 6 (This application) | Compliance with SSD 5093 |
|-----|----------|---------------|-------------------|-----------------------------------|--------------------------|
| 118 | E | 3:1 | 2.59:1 | 4.36:1 | No – 40% Variation |

In addition to the increase in floor space ratio from 2.59:1 as originally approved to 4.36:1, representing an additional GFA of 4,686sqm, the modification also seeks to increase the overall height of Building E at this location from 6 storeys to 13 storeys. This represents a significant change from the height and density as approved as part of the original concept plan. It is our view that the applicant has not undertaken a sufficient quantitative and qualitative analysis of the development as proposed to be modified to be satisfied that the development is 'substantially the same' as that which was originally approved.

Concern is raised as to the extent of overshadowing, the visual impact at this location and the distribution of density adjoining the common boundary with the Civic Quarter. The documentation submitted has not considered in sufficient detail the potential impact of the increase in density and height at this location on the adjoining established land uses and more importantly the role of the Civic Quarter in the *Macquarie Park Innovation Precinct Place Strategy*.

Overshadowing

The amended application results in additional overshadowing of the Civic Quarter. The extent of overshadowing is shown at 9am and 10am, as measured on the 21st June (Figure 3) and as measured on 22nd December (Figure 4). We would note that the overshadowing diagrams prepared are not entirely clear when considering the development as approved and as proposed.

While the rationale behind the re-distribution of the buildings' gross floor area is understood, additional amenity impacts on our clients' land holding is not supported. The onus is on the applicant to ensure no external impacts on neighbouring sites, and we seek confirmation from the Department on how this will be achieved. We note that concept planning undertaken for the Civic Quarter proposes open space in the form of a park and playing fields which is sensitive to overshadowing.

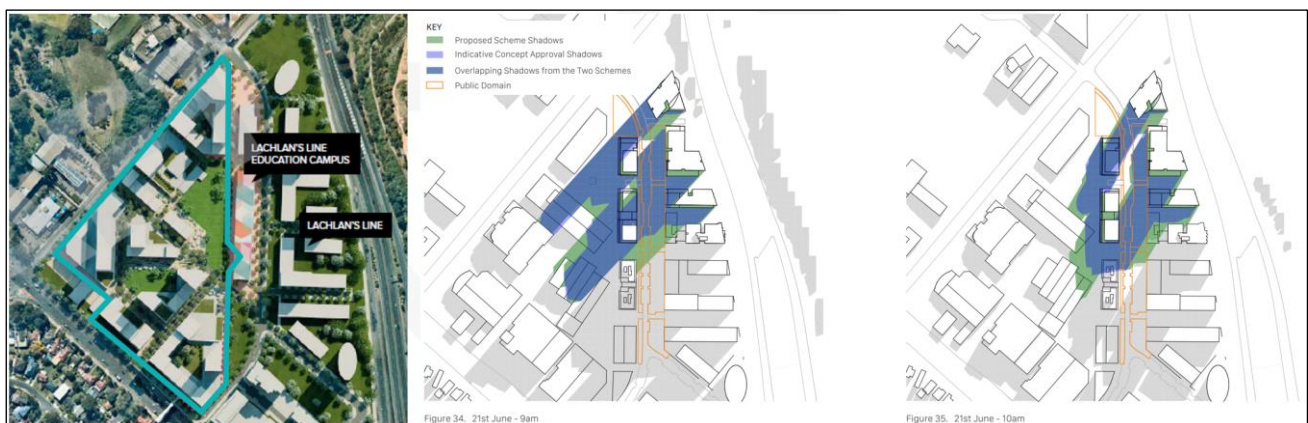


Figure 3 – Overshadowing on Wicks Rd Site



Figure 4 – Overshadowing on Wicks Rd Site

Conclusion

We wish to note our concern over the further potential impact of overshadowing and visual impacts on the landowners holdings as part of the Wicks Road South precinct which has been identified by the *Macquarie Park Innovation Precinct Place Strategy* as accommodating up to 2000 dwellings, which runs the real risk of prejudicing the Departments own Macquarie Park Master Planning.

The planning context for Lachlans Line is now very different from when it was originally approved when considering the *Place Strategy*. Accordingly, whilst the detailed planning of Wicks Road South is yet to be undertaken, we believe any further encroachment by overshadowing may be contrary to the *Place Strategy* and seek an assurance from the Department that this concern has been considered.

We consider this modification application to result in significant adverse impacts on the subject landholding and it is questioned whether the threshold matter of being 'substantially the same development' has been met. The application should therefore not be approved by the Department.

Finally, we consider a modification application that seeks a substantive increase in density to be premature until such time as the detailed planning for Wicks Road South has progressed.

We thank the Department for the opportunity to make a submission. Should you have any further questions, please do not hesitate to contact me.

Yours sincerely,



Mark Grayson
Director
Knight Frank Town Planning
M: 0400 413 701
Mark.Grayson@au.knightfrank.com