



PIRASTA PTY LIMITED
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By email: mark.brown@planning.nsw.gov.au

4 September 2014

Mr. Daniel Keary
Director of Industry, Key Sites and Social Projects
Department of Planning & Environment
GPO Box 39, SYDNEY NSW 2001

Dear Sir

**Submission on exhibited State Significant Development Application
M2 Site within the North Ryde Station Urban Activation Precinct (SSD 5093)**

We provide the following submission on the State Significant Development Application (the 'SSDA') by UrbanGrowth (NSW) for staged development consent to subdivide the M2 Site into 13 development lots with associated facilities.

This submission is made by Pirasta Pty Ltd as the owner of a significant land holding in Macquarie Park comprising the Macquarie Link business park at 277-283 Lane Cove Road, Macquarie Park (title reference Lot 11 in DP 617845).

Macquarie Link is strategically important in the context of the Macquarie Park Station Precinct.

Our submission dated 11 May 2013 (copy attached) supported the exhibited proposal for the North Ryde Station Urban Activation Precinct (NRSP) based on:

- Its context within the accepted strategy for the Macquarie Park Corridor (MPC) whereby any mixed use / residential development must be contained at either end of the corridor, outside of the B3 and B7 zones, thereby retaining the integrity of the MPC core as a commercial precinct.
- The potential for NRSP to make a substantial contribution to housing targets without compromising the integrity of MPC as a nationally significant employment generator.
- Recognition of MPC, in accordance with the Metropolitan Plan, as "a strategic centre and the northern anchor of the 'Global Economic Corridor'.....this region accounts for the majority of Sydney's globally oriented commercial businesses and over 10% of the National Gross Domestic Product."

We continue to support the NRSP concept for the above reasons but now wish to express concern, particularly in relation to the SSDA, that the commitment to external road infrastructure is inadequate and lacks impetus.

Essential improvements to the external road network include the upgrading of three strategically important intersections:

1. Epping Road / Wicks Road
2. Wicks/Waterloo Road
3. Waterloo/Lane Cove Road

Each intersection is critical to the functioning of Macquarie Park's commercial core and the realisation of Metropolitan Strategy targets for MPC, including an additional 16,000 jobs by 2031.

The intersections are already failing, with lengthy peak period delays and queuing, acknowledged by the applicant's Environmental Impact Statement and Traffic/Transport Impact Assessment.

The intersections will be placed under more pressure by development of the M2 Site and need urgent upgrading without compromising existing access arrangements.

In summary:

- This is a very serious long standing problem.
- Proposed subdivision works for M2 will not improve the situation.
- Current and future development throughout Macquarie Park will make it much worse.

Our concerns relating to the traffic aspects of the SSDA include:

- No off site mitigation proposed other than traffic lights at Wicks/Waterloo. Most of the essential off-site improvements are deferred for resolution (perhaps) when individual lots are developed.
- Reliance on the Transport Management and Accessibility Plan (TMAP, 2013 exhibit and subsequent modelling review for the applicant) containing modal split and land use assumptions that in our view understate potential car utilisation.
- Envisaged reduction in additional turning lanes at Epping/Wicks compared with the already inadequate recommendations of the exhibited TMAP.
- Admission in EIS that the intersections 'will still be under considerable stress' even when (if) the TMAP's mitigation measures are implemented.
- Failure of both SSDA and TMAP and to address the very substantial potential increase in commercial floor space throughout Macquarie Park consistent with Council and State Govt. objectives for the corridor.
- Uncertainty of timing and funding of intersection improvements.

The NSW State Govt. is committed to the planning and economic objectives for the MPC.

UrbanGrowth NSW is the State's "urban transformation authority". It seeks "world class urban renewal that will deliver housing and jobs growth, and improve the amenity and liveability of our urban spaces."

Part of UrbanGrowth's focus is to:

"Drive economic growth through unlocking investment
...by coordinating and delivering lead-in infrastructure and services in urban areas
...by planning and fast tracking urban transformation projects for the benefit of the community".

The State already benefits from a windfall increase in land value from the rezoning of the M2 Site.

UrbanGrowth's disposal of the super lots will realise in the order of **\$0.5 BILLION**.

Pirasta submits that part of this revenue windfall should now be applied to the crucial offsite road and intersection works necessary to upgrade the traffic network in the 'triangle' described by three intersections. This should be done **immediately and comprehensively** to address current and future needs.

Pirasta has sought the identified traffic network improvements for two decades.

The scale of the revenue opportunity created by rezoning and subdivision of the M2 Site now dictates that State funding be directed to this infrastructure, urgently.

We request that any development consent for the M2 Site be conditioned accordingly.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Tim Flett', with a stylized, cursive script.

Tim Flett
Property Manager, Dunnet Group
For Pirasta Pty Ltd

ANNEXURES

1. Pirasta Pty Ltd submission on North Ryde Station UAP 11 May 2013
2. Addendum to UAP submission 16 May 2013
3. Letter to Ryde Council 11 December 2012



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By email: plan_comment@planning.nsw.gov.au

11 May 2013

The Director, Strategic Assessment
Department of Planning & Infrastructure,
GPO Box 39, SYDNEY NSW 2001

Dear Sir/Madam

**North Ryde Station Urban Activation Precinct
Submission on the exhibited proposal**

We provide the following submission in support of the exhibited proposal for the North Ryde Station Urban Activation Precinct (the "Proposal").

This submission is made by Pirasta Pty Ltd as the owner of a significant land holding in Macquarie Park comprising the business park at 277-283 Lane Cove Road, Macquarie Park ("Macquarie Link", formerly North Rydelink Business Park – title reference Lot 11 in DP 617845).

Macquarie Link comprises over 5,500 sqm of multi-purpose business space. It represents a significant part of the Lane Cove Road/Metro Route 3 eastern frontage between Waterloo and Talavera Roads and is very strategic holding in the context of the Macquarie Park Station Precinct.

Our support for the Proposal is based on its context within the accepted strategy for the Macquarie Park Corridor ("MPC") whereby any mixed use / residential development must be contained at either end of the corridor, thereby retaining the integrity of the MPC core as a commercial precinct.

By locating the urban activation precinct to the east of Wicks Road, the Proposal respects this principle and reinforces the policy adopted by both Department of Planning & Infrastructure and Ryde City Council that residential development must be located outside of the B3 and B7 zones identified in Council's Draft LEP 2011.

On this basis, the Proposal represents an appropriate response to the opportunity that the North Ryde Station Precinct represents to make a substantial contribution to housing targets. It does so without compromising the integrity of MPC as a nationally significant employment generator.

The proposal appropriately states that: "The Macquarie Park Corridor (MPC), which includes the Precinct, is identified in the Metropolitan Plan for Sydney 2036 (Metropolitan Plan) as a strategic centre and the northern anchor of the 'Global Economic Corridor'.

The Global Economic Corridor is an area of global economic activity stretching from Port Botany and Sydney Airport, through the CBD, North Sydney and St Leonards to Macquarie Park.....this region accounts for the majority of Sydney's globally oriented commercial businesses and over 10% of the National Gross Domestic Product."

We also note that the updated Metropolitan Strategy identifies Macquarie Park as a Specialised Precinct with the following objectives:

- Continued development as a metropolitan-scale office park with a technology focus in the Global Economic Corridor, supporting and supported by the growth of Macquarie University Research Park, Macquarie Hospital, Macquarie Centre, Macquarie Park and Riverside Corporate Park.
- Expand office space to increase productivity advantages and prioritise office space over Housing
- Provide capacity for at least 16,000 additional jobs to 2031

Accordingly we request the Department's resilience in keeping housing out of the MPC core as represented by the current extent of the B3 and B7 zones and its acceptance of Council's proposed amendment to DLEP 2011 to prohibit separate titling of serviced apartments within these zones.

As background we provide (by attachment to the covering email) a copy of our letter to Council dated 11 December 2011. This expresses concern that a Council resolution made 12 June 2012 appears to encourage an adjoining landowner to pursue a residential master plan in respect of 33 Waterloo Road, which is zoned B3.

Pirasta seeks the Department's assistance in ensuring that any Planning Proposal made in response to this resolution is rejected immediately.

Yours faithfully,



Tim Flett
Property Manager, Dunnet Group
For Pirasta Pty Ltd

From: Tim Flett
Sent: Thursday, 16 May 2013 8:23 PM
To: plan_comment@planning.nsw.gov.au; Malcolm McDonald
Subject: Addendum to Pirasta submission - North Ryde Station Urban Activation Precinct
Importance: High

Malcolm,

Thank you for your emails copied below.

Further to our correspondence we provide the following Addendum to the Pirasta submission dated 11 May 2013.

Regards
Tim

The Director, Strategic Assessment
Department of Planning & Infrastructure,
GPO Box 39, SYDNEY NSW 2001

Dear Sir/Madam

Re: North Ryde Station Urban Activation Precinct - Addendum to Submission on the exhibited proposal

Pirasta Pty Ltd, as owner of the 277-283 Lane Cove Road, Macquarie Park ("Macquarie Link", formerly North RydeLink Business Park) wishes to add the following comments to its submission dated 11 May 2013.

We note that the Proposal envisages changes to the Macquarie Park road network including the provision of an additional right turn only lane from Waterloo Road westbound at its intersection with Lane Cove Road.

Pirasta submits that this and any other road modifications must ensure at all times that existing access/egress arrangements for Macquarie Link are not in any way diminished.

We have made the same comment in relation road network alterations envisaged in Ryde City Council's draft DCP 2011 and as background attach a copy of the Pirasta submission to Ryde City Council dated 13 July 2012. Please see items 1. and 4. on page 2 of that submission, in particular our objection to any proposal for a median strip on Waterloo Road between Lane Cove Road and Eden Park Drive.

As before, an acknowledgement of this addendum by return email will be appreciated, thank you

Yours faithfully

Tim Flett
Pirasta Pty Ltd (part of the Dunnet Group)
Mobile: 0413 304 711

From: Malcolm McDonald <Malcolm.McDonald@planning.nsw.gov.au>

Date: 16 May 2013 11:39:51 AM AEST

To: Tim Flett <Tim@dunnet.com.au>

Subject: Re: Email 2 of 2 - Pirasta submission - North Ryde Station Urban Activation Precinct

Hi Tim

Our traffic consultant has reviewed your email and the diagrams from the TMAP and has advised:

The TMAP Appendix I (near the end of exhibited PDF Appendix K / part 3) is correct, we are proposing widening on the northern side of Waterloo Road, so the access on the northern side will need to be modified. The image on Page 127 is schematic – it is standard output from the intersection modelling software used (SIDRA). By default this program places the left-turn bay in this position regardless of the geometry (I cannot change it). This does not change the numerical calculation of the intersection performance, it is purely a display issue. The aerial photo sketch was included for the purpose of showing where the widening would be.

As such, issues relating to access implications to your site would be worked through with RMS at the detailed design stage.

Regards
Malcolm

Malcolm McDonald
Senior Planning Officer,
Strategic Assessment

NSW Department of Planning & Infrastructure | GPO Box 39 | Sydney NSW 2001

T 02 9228 6267 E malcolm.mcdonald@planning.nsw.gov.au

Please consider the environment before printing this email.

>>> Tim Flett <Tim@dunnet.com.au> 14/05/2013 5:59 PM >>>
Malcolm,

Attaching as promised two extracts from the TMAP.

Both relate to potential upgrading of the Waterloo Rd intersection at Lane Cove Road with an additional right turning lane westbound:

- Page 127 / item 5 diagram. This indicates that the additional road width comprises a new left turning lane along the southern side of Waterloo Road, with the existing left-turn lane converted to a through lane, suggesting that widening will occur on the southern side of Waterloo Road.
- Aerial overlay from TMAP Appendix I (near the end of exhibited PDF Appendix K / part 3) showing the same intersection proposal, but seemingly different in configuration suggesting widening on the northern side of Waterloo Road.

The latter proposal could affect our access at 31 Waterloo Road, which comprises a right to way to the rear of 33 Waterloo Road.

I will call again to discuss.
Regards, Tim

From: Tim Flett
Sent: Tuesday, 14 May 2013 5:36 PM
To: 'malcolm.mcdonald@planning.nsw.gov.au'
Subject: Pirasta submission - North Ryde Station Urban Activation Precinct
Importance: High

Malcolm,

Further to our conversation I attach a copy of the Pirasta Pty Ltd submission comprising the covering email below and the attached letter to the Department dated 11 May 2013 along with (as background) a copy of our letter to Ryde City Council dated 11 Dec 2012.

Note the submission is supportive.

As discussed we are considering an additional submission in relation to the potential upgrading of Waterloo Road at Lane Cove Road and in this respect will forward relevant extracts from the TMAP exhibited for the North Ryde Station Urban Activation Precinct.

Regards
Tim Flett
Property Manager
Dunnet Group / Pirasta Pty Ltd
PH: 0413 304 711

From: Tim Flett
Sent: Saturday, 11 May 2013 7:45 PM
To: 'plan_comment@planning.nsw.gov.au'
Cc: Dunnet, Bob (bob@dunnet.com.au); Meryl Bishop
Subject: North Ryde Station Urban Activation Precinct
Importance: High

We provide the attached submission by **Pirasta Pty Ltd** on the exhibited proposal for North Ryde Station Urban Activation Precinct.

A copy of Pirasta's letter to Council 11/12/2012 is also attached as background.

An acknowledgement of the submission by return email will be appreciated, thank you

Regards
Tim Flett

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11 December 2012

The General Manager,
City of Ryde
Locked Bag 2069
NORTH RYDE NSW 1670

By email

Dear Sir

Draft Ryde LEP 2011 – Submissions and Related Matters
Representation to Council Meeting on 11 December 2012

We refer to Pirasta's written submission dated 13 July 2013, the writer's verbal submission at Council's meeting on 24 July 2012, and the Summary of Verbal Submissions provided as Attachment 6 to the Agenda for tonight's Council Meeting (Agenda No. 23/12).

Both the written and verbal submissions on the exhibited Draft Ryde Local Environmental Plan 2011 ("DLEP") and Draft Development Control Plan 2011 ("DDCP") were made by Pirasta as owner of the following properties in Macquarie Park:

- **277-283 Lane Cove Road, North Ryde ("North Rydelink Business Park")**
– Title reference Lot 11 in DP 617845.
- **Shop 7, 285 Lane Cove Road, Macquarie Park**
– Lot 7 in Strata Plan 18124.

As stated, these properties represent a significant part of the Lane Cove Road eastern frontage between Waterloo and Talavera Roads and a very strategic holding in the context of the Macquarie Park Station Precinct.

This further representation relates to Council's reporting of verbal submissions, which lists the writer as speaker 14 in Attachment 6 on Page 52.

We are concerned that the summary provided does not accurately reflect what the writer said at the 24 July meeting, and request that Council considers and records the actual context as follows.

The speaker summary correctly refers to Pirasta's support for Council's proposal to prohibit strata titling of serviced apartments and the continued prohibition of all other residential uses. However, the summary refers to the B7 zone only. The writer's verbal submission referred to these matters in relation to both the B7 zone and in particular the B3 Commercial Core zone. The writer also expressed a specific concern that another property owner (Investron Pty Ltd) has made a submission on the DLEP seeking amended controls to enable residential development at 31-33 Waterloo Road, which adjoins North RydeLink Business Park.

The writer's address to Council made it clear that Pirasta objects to any residential development of land adjoining or nearby the North RydeLink Business Park and explained that the primary reason for this objection is the incompatibility of residential use with the established North RydeLink Business Park. The estate caters for a wide range of commercial, technology and light industrial uses, consistent with the objectives of the B3 zone. If residential apartments are developed nearby our tenants will inevitably suffer from complaints against legitimate commercial activity such as access by delivery vehicles.

Pirasta's position is supported by Council and Metropolitan policy that the commercial spine of Macquarie Park is to remain as a state significant employment generator. This policy was reinforced with detailed explanation by the Group Manager, Environment and Planning at the Workshop on Amended Controls for Macquarie Park held on 11 September. The Group Manager's comments at the workshop were in answer to a question from the writer.

We add that Council's response to the Investron submission, as set out in the reporting of submissions, is potentially counter-productive by referring to the 12 June resolution inviting the proponent to submit a commercial/residential master plan for 31-33 Waterloo Road. This could be construed as encouragement!

Accordingly we reaffirm Pirasta's opposition to all forms of residential development in the vicinity of North RydeLink Business Park and request Council's unambiguous rejection of any proposal that has potential to undermine the commercial integrity of the precinct.

As discussed with the Manager Urban Planning we request that this letter be included in the briefing papers for Councillors attending the meeting tonight.

Yours faithfully,



Tim Flett
Property Manager, Dunnet Group
For Pirasta Pty Ltd