

25 September 2014

Row No.	Submission	UGNSW Response
	SUBMISSION BY TfNSW and RMS	
1	<p>The TMAP included the following objectives:</p> <ul style="list-style-type: none"> • Adoption of Transit Orientated Development principles to maximize the use of public transport, walking and cycling • Manage the transport impacts of the North Ryde Station Precinct Project on surrounding sites and transport networks • Help reduce reliance on the private motor vehicle <p>TfNSW believes that in order for these objectives to be met the following statements of commitment should be given or otherwise conditions applied by Department of Planning and Infrastructure to achieve the following:</p>	<p>UGNSW supports these objectives for the North Ryde Station UAP and has prepared the development application (DA) in order to deliver one aspect of the proposed transport network contemplated by the TMap and the North Ryde Station Development Control Plan (DCP). In resolving the design of Station Street and Road 38 North as proposed in the DA, UGNSW has had to take into account all of the relevant site constraints and the requirements of the owner of the North Ryde Station South Site, whose co-operation is necessary to enable any road to be delivered on that site. This has resulted in some departures from the controls in the DCP, however UGNSW believes that the proposals in the DA represent a desirable means of achieving the objectives of the DCP within the spirit of flexibility expressed in Clause 1.7 of the DCP.</p> <p>One further point should be made by way of introduction concerning the DA. In assessing the DA, it should be borne in mind that the DA seeks approval for infrastructure which accommodates traffic demand, rather than generates traffic demand. The DA seeks consent for the provision of transport infrastructure, namely roads, and the environmental impact of these proposed roads does not add to the demand for transport in the locality. On the contrary, those roads are intended to form part of the infrastructure required to deliver the North Ryde Urban Activation Precinct as a Transit Oriented Development.</p>
1.1	<p>1. An addendum transport report be prepared that includes traffic impact assessment for the Wicks Road/Waterloo Road intersection and the intersections along Delhi Road reflecting the traffic generated by the revised development proposal and an "uncapped growth" scenario for traffic volumes across the road network to assess the impacts on</p>	<p>The development for which consent is sought, namely the provision of two minor roads and consent to the "shifting" of GFA has no impact on bus services and does not increase the demand for bus services. The "<i>revised development proposal</i>" is not an environmental impact of the development proposed in the DA. It follows that the traffic generated by the "<i>revised development proposal</i>" cannot be an environmental impact</p>

	future bus movements at these locations and to identify appropriate infrastructure works to minimise impacts on bus movements.	of the development proposed in the DA. The Transport Impact Assessment Report lodged with the DA comprehensively addresses the issues relevant to the T Map. Further traffic assessment to gauge impacts on future bus movements in the road network is matter which is outside the scope or impacts of the development proposed in the DA.
	SUBMISSION BY TfNSW and RMS	
1.2	<p>2. Implementing maximum parking rates which are at the bottom of the range allowed for in the relevant Ryde Council DCP as follows:</p> <ul style="list-style-type: none"> • 1 bedroom apartment- 0.6 space per dwelling • 2 bedroom apartment- 0.9 space per dwelling • 3 bedroom apartment - 1 space per dwelling • Visitor parking - 0.1 space per dwelling 	The DA does not seek to implement any parking arrangements nor to obtain approval for any development which gives rise to any demand for parking. In any event the North Ryde Station Precinct Development Control Plan of 4 December 2013 contains provisions in respect of parking requirements.
1.3	<p>3. A commitment from UGNSW and the other development partners that the road network comprising Road 38, Road 18 and Julius Avenue will have swept paths capable of accommodating a 14.5 non rear steer bus. TfNSW also requests that a layover area be provided within the above mentioned road network to accommodate two (2) 14.5m buses with draw in/draw out space and provision of suitable signage or kerb indentation if necessary.</p>	<p>UGNSW's engineers advise that Road 38 as shown in Site Layout and Grading Plan Number C3-02 (Revisions 2, 3 and 5) is capable of accommodating a 19-metre articulated bus (adopting the Austroads 19.0m bus turning template with 15.0m turning radius which according to Austroads requires a 15-metre turning circle) in both directions as shown in the attached drawing showing swept paths for a 19-metre articulated bus. However, it should be noted that:</p> <ul style="list-style-type: none"> • If it were proposed to use the northbound swept path for bus circulation, the traffic island in Road 38 which is presently shown within that path in the attached drawing should not be built, and a bus-only right turn should be considered instead; • If it were intended to use both the northbound and southbound paths shown in the attached drawings, it would be necessary to widen the proposed connection of Road 18 to Road 38, but this would be on land outside the Site of this DA; and • The last eastbound bus stop on Delhi Road which is west of Road 38 is too close to Road 38 to comfortably permit a bus which is

		<p>departing from that bus stop to make the right turn into Road 38.</p> <p>The practical consequence of the foregoing is that an end-of-bus-route turning loop for a bus service could be utilised by having eastbound buses in Delhi Road opposite the rail station proceed easterly, past Road 38, and turn right into Julius Ave (West or East), then enter the eastern end of proposed Road 18, turn right into Road 38 and then left onto Delhi Road and to proceed in a westerly direction. Both of these loops (that is, whether via Julius Ave West or East) can accommodate:</p> <ul style="list-style-type: none"> • a 12.5-metre rigid bus in both directions; and • subject to widening of the proposed connection of Road 18 to Road 38, a 19-metre articulated bus in both directions. <p>A swept path analysis for a 12.5-metre rigid bus is also attached in substantiation of this advice.</p> <p>UGNSW has no means of controlling other landowners or other existing or proposed public roads. If the bus network route suggested above were implemented, this would solve the problem with which TfNSW's comments appear to be concerned. In addition, Country Garden Australia Pty Limited has asked that consideration be given to using an end-of-bus-route turning loop which requires eastbound buses on Delhi Road to turn right into Julius Avenue West, proceed around the round-about in Julius Avenue West and exit Julius Avenue West by a left turn into Delhi Road.</p> <p>It is also important to note that the amount of land required to accommodate a bus layover area would impose substantial limitations on the future development of the Station North Site. Bus layovers in Station Street were not contemplated in the T Map and, in UGNSW's submission, should not be contemplated now.</p>
1.4	4. Ensuring the Intersection design for Delhi Road/Road 38 intersection is approved by the RMS. Signal plans and traffic signal modelling needs to be provided to the RMS to their satisfaction.	UGNSW will consider accepting an appropriate condition requiring the design of the intersection, including the provision of detectors, phasing and cycle times to be resolved to the reasonable satisfaction of the RMS.
1.5	5. Ensuring Road 18 and Station Street be redesigned to accommodate through cycle access. Pedestrian and cycle access should also be	The current design of the proposed Station Street and proposed Road 38 accommodates cycle access with 3 metre footpaths which are capable (as

	maintained between Station Street and the pedestrian/cycle bridge over Delhi Road as proposed in the DCP.	with the required 3 metre width of the proposed overhead bridge) of being used as a pedestrian/cyclist shareway. As there is no access to the rear of the North Ryde Railway Station, nor any proposal by TfNSW to provide such access, there is little utility in a cycleway which delivers pedestrians or cyclists to the rear of the Station. Although it is not relevant to this DA, UGNSW intends to seek approval for completion of the Macquarie Active Transport Spine between Macquarie University and Riverside Corporate Park by means of a shared path from the proposed overhead Delhi Road Bridge along Delhi Road past the entrance to North Ryde Railway Station, then along proposed Road 38 to a point which will enable a future connection to the future Road 18. This proposal is included in UGNSW's current development application in respect of the M2 Site, however that development application is independent of the development application for the Station North and South sites. It is submitted that the alternative proposal for a shared way along Delhi Road in the development application for the M2 Site complies with Clause 1.7.1 of the North Ryde Station Precinct DCP.
1.6	6. The applicant works with TfNSW and Ryde Council to redesign these streets to achieve an acceptable transport function and quality public domain outcome within the Station Precinct. This action is necessary to ensure that a convenient and safe transport interchange is provided adjacent to North Ryde Station.	UGNSW submits that, having regard to the highly constrained nature of the Site, the current design of Station Street and part Road 38 has achieved an acceptable transport function and a quality public domain outcome. UGNSW submits that the design of the proposed Station Street and part Road 38 in the DA is convenient, safe and, in the case of the Station North Site, delivers the important public benefit of providing access to the site otherwise than to or from the site's existing frontage to Delhi Road.
	SUBMISSION BY TfNSW and RMS	
1.7	7. Direct consultation with the North West Rail Link Project Team on the design of the proposed station interface and public domain works. It is requested that consultation should occur as early as possible during the design process and prior to lodgement of any development application for station site north.	There is no proposal by the rail operator to provide access to the rear of North Ryde Railway Station nor is there any reason to delay the current DA for the consultation submitted by TfNSW. The design of the proposed Station Street in the DA will enable future connection to the rear of the railway station in the event that, in future, the rail operator does formulate a proposal for such a connection.

1.8	8. Supply of a copy of the Public Transport Facilities Plan with details to be provided for bus stops, taxi, kiss & ride facilities, cycle facilities and the interchange /access between these and the North Ryde station.	There is no Public Transport Facilities Plan. Control 5 in Part 3.3 of the North Ryde Station Precinct DCP makes it clear that a Public Transport Facilities Plan is not required in respect of this DA. The development for which consent is sought in the DA does not create any demand for any of the facilities raised in this submission and they are not otherwise relevant except as referred to in responses above.
1.9	9. Continuation of work with TfNSW, RMS and Ryde Council to consider how improved infrastructure to provide better pedestrian access can be achieved along the key desire line for pedestrians between Road 38 and the intersection of Epping/Pittwater Roads. This corridor is an important desire line which links the station precinct to the residential catchment areas between Pittwater and Cressey Roads. The same link would also provide residents in the North Ryde Station Precinct with access to Epping Road bus services.	The development for which consent is sought in the DA does not create any demand for, or give rise to any environmental effect which is relevant to, the “key desire line” mentioned in this submission.
2	TfNSW will continue to work with UrbanGrowth NSW (UGNSW) to identify the preferred scope of road infrastructure projects that complement the \$10.4 million funding already committed to the State Road Network. This includes any upgrade works on Delhi Road are provided in order to ensure that the optimal improvements are made to improve the traffic flow as well as bus services on the State Road network.	UGNSW has committed (subject to conditions) to provide a contribution of \$10.4M towards transport measures around the Urban Activation Precinct, including works in Wicks, Epping and Delhi Roads as identified in Annexure A of the Finalisation Report, however that commitment is proposed in UGNSW’s development application in respect of the M2 Site and should not be part of the conditions relevant to the DA. Any suggested additional works to ensure that “ <i>optimal improvements</i> ” are made for traffic flow and bus services involves: <ul style="list-style-type: none"> • Re-examining issues already dealt with in the T Map; and upon which the implementation of the UAP is based • Matters which are not part of the environmental impact of the roads proposed in the DA.
3	2. That a reduction in public transport kerbside space cannot occur on Delhi Road until the function and configuration of Delhi Road as part of a future sub- regional strategy is established.	There is no suggestion in the DA that there be a reduction of kerbside space in Delhi Road nor is this a necessary, or even possible, effect of approving the development proposed in the DA.
4	Issue 1 - Proposed Resolution	

	<p>The proponent should issue an addendum report with traffic impact assessment for the Wicks Road/Waterloo Road intersection and the intersections along Delhi Road using uncapped growth traffic volumes to assess the impacts on future bus movements at these locations. The report should identify appropriate infrastructure works to minimise impacts on bus movements.</p>	<p>This submission is answered in Row 1.1 above, as follows:</p> <p>The development for which consent is sought, namely the provision of two minor roads and consent to the “shifting” of GFA has no impact on bus services and does not increase the demand for bus services. The “<i>revised development proposal</i>” is not an environmental impact of the development proposed in the DA. It follows that the traffic generated by the “<i>revised development proposal</i>” cannot be an environmental impact of the development proposed in the DA. The Transport Impact Assessment Report lodged with the DA comprehensively addresses the issues relevant to the T Map. Further traffic assessment to gauge impacts on future bus movements in the road network is matter which is outside the scope or impacts of the development proposed in the DA.”</p>
5	<p>Issue 2 - Proposed Resolution</p> <p>TfNSW requests that the proponent commit to not exceeding the following car parking rates in relation to this site.</p> <ul style="list-style-type: none"> • 1 bedroom apartment - 0.6 space per dwelling • 2 bedroom apartment- 0.9 space per dwelling • 3 bedroom apartment - 1 space per dwelling • Visitor parking - 0.1 space per dwelling 	<p>This submission is answered in Row 1.2 above, as follows:</p> <p>The DA does not seek to implement any parking arrangements nor to obtain approval for any development which gives rise to any demand for parking. In any event the North Ryde Station Precinct Development Control Plan of 4 December 2013 contains provisions in respect of parking requirements.</p>
6	<p>Issue 3 - Proposed Resolution</p> <p>UGNSW commits to the following:</p> <ul style="list-style-type: none"> • An assurance Road 38, Road 18 and Julius Avenue will be provided for bus turnaround inclusive of swept paths for 14.5m non rear steer buses and two bus layover spaces for 14.5 metre buses. • Bus stops, bus layover, driver/toilet facilities to be committed to in the M2 site. UGNSW to undertake and report on the costs involved in providing a covering canopy on the pedestrian bridge from the M2 Site to North Ryde Station. 	<p>Most of this submission is answered in Row 1.3 above, as follows:</p> <p>UGNSW’s engineers advise that Road 38 as shown in Site Layout and Grading Plan Number C3-02 (Revisions 2, 3 and 5) is capable of accommodating a 19-metre articulated bus (adopting the Austroads 19.0m bus turning template with 15.0m turning radius which according to Austroads requires a 15-metre turning circle) in both directions as shown in the attached drawing showing swept paths for a 19-metre articulated bus. However, it should be noted that:</p> <ul style="list-style-type: none"> • If it were proposed to use the northbound swept path for bus circulation, the traffic island in Road 38 which is presently shown within that path in the attached drawing should not be built, and a bus-only right turn should be considered instead; • If it were intended to use both the northbound and southbound paths shown in the attached drawings, it would be necessary to widen the proposed connection of Road 18 to Road 38, but this would be on land outside the Site of this DA; and • The last eastbound bus stop on Delhi Road which is west of Road 38 is too close to Road 38 to comfortably permit a bus which is departing from that bus stop to make the right turn into Road 38.

		<p>The practical consequence of the foregoing is that an end-of-bus-route turning loop for a bus service could be utilised by having eastbound buses in Delhi Road opposite the rail station proceed easterly, past Road 38, and turn right into Julius Ave (West or East), then enter the eastern end of proposed Road 18, turn right into Road 38 and then left onto Delhi Road and to proceed in a westerly direction. Both of these loops (that is, whether via Julius Ave West or East) can accommodate:</p> <ul style="list-style-type: none"> • a 12.5-metre rigid bus in both directions; and • subject to widening of the proposed connection of Road 18 to Road 38, a 19-metre articulated bus in both directions. <p>A swept path analysis for a 12.5-metre rigid bus is also attached in substantiation of this advice.</p> <p>UGNSW has no means of controlling other landowners or other existing or proposed public roads. If the bus network route suggested above were implemented, this would solve the problem with which TfNSW's comments appear to be concerned. In addition, Country Garden Australia Pty Limited has asked that consideration be given to using an end-of-bus-route turning loop which requires eastbound buses on Delhi Road to turn right into Julius Avenue West, proceed around the round-a-bout in Julius Avenue West and exit Julius Avenue West by a left turn into Delhi Road.</p> <p>It is also important to note that the amount of land required to accommodate a bus layover area would impose substantial limitations on the future development of the Station North Site. Bus layovers in Station Street were not contemplated in the T Map and, in UGNSW's submission, should not be contemplated now.</p>
7	<p>Issue 4 - Proposed Resolution</p> <p>TfNSW will not support the proposed changes to public and active transport infrastructures on Delhi Road (including bus lanes, bus stops and cycle lanes) at least until function and configuration of Delhi Road as part of sub-regional strategy is established.</p>	<p>None of the "proposed changes" described in this submission are proposed in this DA.</p>
8	<p>Issue 5 - Proposed Resolution</p> <p>TfNSW requests that:</p> <ul style="list-style-type: none"> • the intersection of Road 18 and Station Street be redesigned to accommodate through cycle access. • Station Street be redesigned to provide dedicated cycle access or extension of the shared zone 	<p>This submission is answered in Row 1.5 above, as follows:</p> <p>The current design of the proposed Station Street and proposed Road 38 accommodates cycle access with 3 metre footpaths which are capable (as with the required 3 metre width of the proposed overhead bridge) of being used as a pedestrian/cyclist shareway. As there is no access to the rear of the North Ryde Railway Station, nor any proposal by TfNSW to provide such access, there is little utility in a cycleway which delivers pedestrians or cyclists to the rear of the Station. Although it is not relevant to this DA, UGNSW intends to seek approval for completion of the Macquarie Active Transport Spine</p>

	<ul style="list-style-type: none"> pedestrian and cycle access is provided between Station Street and the proposed pedestrian/cycle bridge over Delhi Road. 	<p>between Macquarie University and Riverside Corporate Park by means of a shared path along from the proposed overhead Delhi Road Bridge along Delhi Road past the entrance to North Ryde Railway Station, then along proposed Road 38 to a point which will enable a future connection to the future Road 18. This proposal is included in UGNSW's current development application in respect of the M2 Site, however that development application is independent of the development application for the Station North and South sites. It is submitted that the alternative proposal for a shared way along Delhi Road in the development application for the M2 Site complies with Clause 1.7.1 of the North Ryde Station Precinct DCP.</p>
9	<p>Issue 6 - Proposed Resolution</p> <p>Given the importance of ensuring convenient and safe transport interchange functions adjacent to the North Ryde Station, it is requested that the applicant work with TfNSW and Ryde Council to redesign these streets to achieve an acceptable transport function and quality public domain outcome within the Station Precinct. Transport for NSW undertakes to provide a suitable letter of acceptance advising when satisfactory arrangements are agreed.</p>	<p>This submission is answered in Row 1.6 above, as follows:</p> <p>UGNSW submits that, having regard to the highly constrained nature of the Site, the current design of Station Street and part Road 38 has achieved an acceptable transport function and a quality public domain outcome. UGNSW submits that the design of the proposed Station Street and part Road 38 in the DA is convenient, safe and, in the case of the Station North Site, delivers the important public benefit of providing access to the site otherwise than to or from the site's existing frontage to Delhi Road.</p>
10	<p>Issue 7 - Proposed Resolution</p> <p>TfNSW requests that the applicant consult directly with the NWRL Project Team on the design of the proposed station interface and public domain works. It is requested that consultation should occur as early as possible during the design process and prior to lodgement of any development application for station site north. TfNSW will provide a letter of advice when suitable arrangements have been agreed.</p>	<p>This submission is answered in Row 1.7 above, as follows:</p> <p>There is no proposal by the rail operator to provide access to the rear of North Ryde Railway Station nor is there any reason to delay the current DA for the consultation submitted by TfNSW. The design of the proposed Station Street in the DA will enable future connection to the rear of the railway station in the event that, in future, the rail operator does formulate a proposal for such a connection.</p>
11	<p>Issue 8 - Proposed Resolution</p> <p>TfNSW requests a copy of the Public Transport Facilities Plan with details of proposals for bus stops, taxi and kiss and ride facilities and cycle facilities and the interchange /access between these and the North Ryde station be provided.</p>	<p>This submission is answered in Row 1.8 above, as follows:</p> <p>There is no Public Transport Facilities Plan. Control 5 in Part 3.3 of the North Ryde Station Precinct DCP makes it clear that a Public Transport Facilities Plan is not required in respect of this DA. The development for which consent is sought in the DA does not create any demand for any of the facilities raised in this submission and they are not otherwise relevant except as referred to in responses above.</p>
12	<p>Issue 9 - Proposed Resolution</p> <p>TfNSW requests that UGNSW work collaboratively with TfNSW, RMS and Ryde Council to consider how improved pedestrian access infrastructure can be achieved along this key desire line between Road</p>	<p>This submission is answered in Row 1.9 above, as follows:</p> <p>The development for which consent is sought in the DA does not create any demand for, or give rise to any environmental effect which is relevant to, the "key desire line" mentioned in this submission.</p>

	38 and the intersection of Epping/Pittwater Roads. TfNSW will provide a letter of advice when suitable arrangements have been agreed.	
13	<p>Issue 10 - Proposed Resolution</p> <p>TfNSW requests that the proponents work collaboratively with TfNSW and Ryde Council to ensure that transport access arrangements in the vicinity of North Ryde Station are effectively co-ordinated to achieve the outcomes stated in the NRP DCP 2013.</p>	UGNSW has been working, and will continue to work, collaboratively with TfNSW and Ryde Council to pursue the outcomes set out in the NRS DCP 2013 subject to the various relevant site constraints.
14	<p>Delhi Road Upgrades - Resolution</p> <p>TfNSW will continue to work with UGNSW to identify the preferred infrastructure projects that will complement the \$10.4 million funding already committed to ensure optimal improvement are made to improve the traffic flow on the State Road network.</p>	<p>UGNSW's response is the same as in Row 2 above, which is as follows:</p> <p>UGNSW has committed (subject to conditions) to provide a contribution of \$10.4M towards transport measures around the Urban Activation Precinct, including works in Wicks, Epping and Delhi Roads as identified in Annexure A of the Finalisation Report, however that commitment is proposed in UGNSW's development application in respect of the M2 Site and should not be part of the conditions relevant to the DA. Any suggested additional works to ensure that "optimal improvements" are made for traffic flow and bus services involves:</p> <ul style="list-style-type: none"> • Re-examining issues already dealt with in the T Map; and upon which the implementation of the UAP is based • Matters which are not part of the environmental impact of the roads proposed in the DA.
15	<p>Delhi Road Traffic Signals - Resolution</p> <p>The applicant must provide the details of signal timing used in the traffic model to RMS Transport Management Centre for their review and concurrence.</p>	<p>UGNSW will not be in a position to provide these signal timing details. However, this should not delay assessment of the DA as the RMS will determine final cycle and phase times at the Delhi Road/Road 38 intersection from time to time according to RMS's view as to the appropriate priority to be given to that intersection in the broader road network. As indicated in the Traffic Impact Assessment Report lodged with the DA (page17) "... RMS advised that due to the road hierarchy priorities in the area, Road 38 receives the lowest priority in terms of traffic signal green time compared to surrounding roads. As a result, traffic signal phasing should not be modified." As the Station Site South and the Station Site North are developed and then occupied, the amount of traffic generated along Road 38 to and from Delhi Road will increase and will be for RMS to make decisions as to whether or not, and by how much, to adjust the timing of the signals at the intersection, however these decisions by RMS will not be based on the signal timing used in the</p>

		traffic model referred to in the submission opposite.
	SUBMISSION BY RYDE CITY COUNCIL	
16	<p>Allocation of Gross Floor Area</p> <p>In considering the proposed allocation of Gross Floor Area (GFA) to the Station Site North (Lot 1) of 29,900m² it is noted that the current Floor Space Ratio that applies to the subject site is 2.3:1. For the proposed Lot 1, this would normally deliver a total of 26,024.5m². The additional floor space delivered under the proposed allocation would be 3,875.5m². In Council's opinion the strict application of Ryde Local Environmental Plan 2010 to the subject site would not allow the allocation of the additional floor space to the subject site. This is as the total GFA is determined on a case by case basis by what is proposed at time of assessment. This Development Application (DA) does not seek construction for any buildings but only infrastructure.</p> <p>It is unclear from the finalisation report and studies supporting the North Ryde Station Precinct (NRSP) whether the Department's original intent was for the FSR to be inclusive or exclusive of the roads proposed. With regards to this site, it is noted that the Parsons Brinckerhoff, North Ryde Station Precinct Project - Transport Management and Accessibility Plan, November 2012 (p. 13) provides an indicative yield of the subject site of 38,400m². Whilst Council previously raised concerns regarding the TMAP, it is noted that it has since been supported by the Department of Planning and Environment. The proposed GFA does not exceed the envisaged GFA but does propose alternate uses. The supporting documentation accompanying the SSDA has demonstrated that a reduced traffic generation is anticipated as a result of this change in uses.</p> <p>However, this does not allow for any consideration of appropriateness of the resultant built form. Should the proponent continue to seek the additional GFA allocation, it is recommended that further modelling of the potential building envelopes be detailed to demonstrate that this will result in a reasonable outcome for the site. These envelopes</p>	<p>Deposited Plan 1131774 (copy attached) states the area of Lot 4 to be 1.300 hectares = 13,000 square metres. This is made up of 4 separate area measurements shown on DP 1131774 as follows:</p> <p>Part of Lot 4 = 1.203 hectares</p> <p>Part of Lot 4 = 0.01871 hectares (Shown in the DP as 187.1 square metres)</p> <p>Part of Lot 4 = 0.06246 hectares (Shown in the DP as 624.6 square metres)</p> <p>Part of Lot 4 = 0.01585 hectares (Shown in the DP as 158.5 square metres)</p> <p>Total of lot 4 = 1.3 hectares</p> <p>Application of an FSR ratio of 2.3:1 indicates that a maximum Gross Floor Area (GFA) of $2.3 \times 13,000 = \mathbf{29,900 \text{ square metres}}$ is available for Lot 4 in DP1131774. The area of proposed Lot 1 is, as shown on the proposed plan of subdivision forming part of the DA, is 11,315 sm. By deduction, one can calculate that the area of land presently within Lot 4 which it is proposed will be included in the proposed road is 1,685 sm. It follows that, using the 2.3:1 FSR ratio, the GFA calculations are:</p> <ul style="list-style-type: none"> GFA on Proposed Lot 1 = $11,315 \times 2.3$ = 26,024.5 sm GFA on land in Lot 4 to be in proposed road = $1,685 \times 2.3$ = 3,875.5 sm. <p>The sum of these two GFA amounts is, of course, 29,900 sm. This is why, as explained in the EIS, the DA seeks the allocation of an additional 3,875.5 sm of GFA to the proposed Lot 1. If this allocation is made, the outcome will be no more than is necessary to enable the whole of the GFA presently available on Lot 4 to be available on the proposed Lot 1. To put this more colloquially, the requested allocation of GFA will "shift" the GFA presently "stacked" on that land which it is proposed will become a road, onto the proposed Lot 1, where it can be utilized. It is only if this GFA allocation is made (together with other similar allocations</p>

	<p>must demonstrate that there is no additional increase in building height.</p> <p>It is unclear whether the allocation of GFA to Lot 1 would be exclusive of any potential GFA to be allocated to Lots 1, 2 and 3 in DP 1131774. It is also unclear as to how this GFA will be allocated in perpetuity against the subject properties once created.</p>	<p>throughout the UAP) that the UAP will achieve the gross floor area of 330,000 sm mandated by the Department in the Finalisation Report of July 2013. The claim in the Council's submission that <i>"The proposed GFA does not exceed the envisaged GFA but does propose alternate use"</i> is not correct. The DA does not seek consent for anything except road construction and dedication, subdivision and gfa allocation. The Council's claim that the DA <i>"does not allow for any consideration of appropriateness of the resultant built form"</i> is correct. This is because the existing planning controls are the appropriate framework under which to consider issues pertaining to built form and that framework will be enlivened when, in the future, a development application is made to the Council for a building on the proposed Lot 1. Whether the further modelling sought by the Council should be carried out is a matter which should be considered in the context of an application for consent to erect buildings on proposed Lot 1 but this modelling should not be carried out for the purpose of assessing this DA. Nothing in UGNSW's DA will affect the operation of the height controls in the Ryde LEP 2010.</p> <p>UGNSW believes that it is clear from the DA that the GFA of Lots 1, 2 and 3 in DP 1131774 will be unaffected. As to "allocation in perpetuity... once created":</p> <ol style="list-style-type: none"> 1. The GFA in the DA will in no sense be "created". The GFA exists now by virtue of the FSR controls in the Ryde LEP 2010. 2. The allocation "in perpetuity" proposed in the DA is as clear as the operation of the FSR controls in the Ryde LEP 2010 in future. <p>UGNSW is proposing the GFA allocation because it is proposing the subdivision and road opening necessary to deliver the proposed road as a public road prior to the delivery of any built form. Preserving the GFA in the manner proposed by UGNSW will secure the GFA target specified in the Finalisation Report.</p>
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	<p>It is also unclear whether this GFA allocation will need to be amended in the event that Council does not support the dedication of Station Street and Road 38 to Council as a public road.</p>	<p>UrbanGrowth has sought dedication of the roads in its application. This is a fundamental objective of the approval being sought because it will resolve some of the fractured ownership between the various landowners and the construction and dedication of the road will deal with the site constraints mentioned in other parts of UGNSW's response to submissions. Dedication of the roads proposed in the DA will assist in the orderly development of the precinct and adjoining lands.</p> <p>In response to the Department's query, it is also advised that no Section 88B instrument dealing with issues pertaining to GFA is proposed in respect of any of the land presently comprised in Lot 4 in DP 1131774.</p>
17	<p>Transport and accessibility</p> <p>In considering any proposed road design and layout it must be recognised that the NRSP has always been envisaged as a Transit Orientated Development (TOD). The Parsons Brinckerhoff, North Ryde Station Precinct Project - Transport Management and Accessibility Plan, November 2012 supporting the NRSP identifies that the precinct is a TOD as it allows for:</p> <ul style="list-style-type: none"> • prioritisation of pedestrian and cycle activity and proximity to high quality bus and rail facilities and services • reduced levels of private vehicle parking combined with provision for car share schemes and other transport alternatives to reduce car dependency • liveable and active public domain spaces for the community that integrate with proposed land uses and the station, (pp 7-8) <p>The SSDA includes the delivery of 2 roads. These roads include Station Street (shown in blue below) and Road 38. Road 38 extends from Delhi Road through to Lucknow Road, with only Road 38 North (shown in red below) being delivered under the SSDA. Notwithstanding this, Council is in receipt of a DA for 27-37 Delhi Road which includes Road 38 South (shown in yellow below).</p>	<p>UGNSW has no means of controlling what is contained in the development application for the North Ryde Station South Site. Prior to</p>

	<p style="text-align: center;"><i>(Figure Deleted)</i></p> <p>Council does not support the proposed road design. This is as the proposed widths fail to comply with that shown within the North Ryde Station Precinct Development Control Plan 2013 (NRSP DCP 2013). Council's position is that the widths detailed within the NRSP DCP 2013 should be provided. Further detail regarding each road is provided in the following sections.</p>	<p>lodgement of UGNSW's DA, UGNSW's engineers consulted closely with CGA's engineers with a view to ensuring compatibility of the roads proposed in both development applications. It is clear, from the 2 letters dated 5 March 2014 from BGY North Ryde Pty Limited which were lodged with the DA, that the owner of the North Ryde Station South Site is satisfied with the roads proposed in this DA. Under the existing planning controls, so far as the consent authority's role in assessing the DA is concerned, the content of CGA's development application is immaterial to UGNSW's DA since it can be changed at any time prior to determination of CGA's development application without UGNSW's knowledge or consent. The Department is requested to assess UGNSW's DA on its merits.</p> <p>UGNSW's position is as follows:</p> <p>Station Street</p> <ul style="list-style-type: none"> • The highly constrained dimensions of the North Ryde Station North and South Sites, including the substation and rail station infrastructure and the topography of adjoining land supporting existing buildings, have the result that it would be sub-optimal to attainment of the objectives of the UAP to design Station Street in accordance with Figure 11 of the NRSP DCP 2013. • The 3-metre central swale shown in Figure 11 of the DCP has been deleted from the road proposed in the DA because of the highly constrained nature of the Site. The absence of the 3-metre central swale and its landscaping will still mean that there are two parallel rows of landscaping in Station Street, rather than three, and this result is considered adequate. It also means that there will be less constraint on traffic movement in Station
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		<p>Street and this will prove to be an advantage in situations involving vehicle break-downs.</p> <ul style="list-style-type: none"> • The additional footpath width on the northern side of Station Street was intended to accommodate a shared pedestrian/cyclist path. As more fully set out in the response in Row 18 below, UGNSW believes the key desire line reflects the need for access to the rail station along Delhi Road and Road 38, rather than along Station Street, and for this reason, UGNSW proposes to change the proposed location of the overhead pedestrian/cyclist bridge to improve its connection onto Delhi Road and proposes to reduce the footpath on the northern side of Station Street to 3 metres. • The owner of the North Ryde Station South Site was not prepared to agree to provision of a design of Station Street which would be wider than that proposed in the DA because a wider street would make it difficult to provide the minimum area of open space mandated by the DCP within the North Ryde Station South Site. Without that agreement, UGNSW has no other acceptable means of delivering a public road comprising the proposed Station Street. • The dimensions of Station Street proposed in the DA are appropriate for the kind of low-traffic-speed environment which Station Street should be. <p>Road 38</p> <ul style="list-style-type: none"> • The design of Road 38 in the DA adopts the dimensions of Figure 7 in the NRS DCP except: <ul style="list-style-type: none"> ○ An additional north-bound lane 3.25 metres wide has been added; and ○ Given the highly constrained dimensions of the site, and the utility in traffic management terms of a second north-bound lane, it was considered preferable to
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		<p>include the additional north-bound lane instead of a footpath on the eastern side of Road 38.</p> <p>The distance between the south western corner of Lot 3 in DP 1131774 and the western boundary of Lot 21 in DP 1003588 (the Stockland Site) provides a major constraint on the width of Road 38. This constraint is best depicted by the General Arrangement Plan which forms part of the DA and which shows the proposed footpath on the western side of Road 38 intersecting with the south-western corner of the Easement for Access Right 4.5 wide which benefits Lot 3 in DP 1131774.</p> <p>In response to the Council's submission, UGNSW is prepared to consider accepting an appropriate condition of consent requiring construction of a footpath on the eastern side of Road 38 as shown in the attached Site Layout and Grading Plan Number C3-02 Rev 5 (copy attached).</p>
18	<p>General Matters</p> <p>Whilst Road 38 South does not form part of the SSDA, care must be taken that Road 38 North and South are dealt with in a holistic manner. This can be ensured through the consistent application of the requirements of the DCP 2013. It should be noted that the intersection of Station Street and Road 38 is also expected to link with Trinity Road located on 39 Delhi Road. Trinity Road has been subject to several previous DAs, with the most recent being LDA2012/0306 (approved 6 December 2012 but modified 15 August 2013) involving subdivision of 39 Delhi Road and the construction and dedication of the Trinity Road link (Road 18) to Council. No detailed design of the road has been undertaken to date. It should be noted that the application is limited to the existing property boundaries and does not affect land covered by the SSDA. As such, the provision of Road 38 and its connection to Road 18 must be carefully coordinated and as part of the SSDA. A copy of the approved plan for 39 Delhi Road is attached. It</p>	<p>In order to facilitate the "holistic" approach advanced by the Council, UGNSW has arranged the preparation of a plan which enlarges the carriageway proposed in Road 38 from that originally proposed in the DA so that the expanded carriageway matches perfectly with the current proposal for the design of proposed Road 18. However, the "holistic" approach pursued in this submission ignores the fact that UGNSW has no means of controlling other landowners or any land other than Lot 4 in DP 1131774. In the present case, and given its unique role and brief, UGNSW is attempting to act as a facilitator in delivering and encouraging others to deliver outcomes which are consistent with the UAP, however it is not the role of a development consent to compel disparate parties to ensure that these outcomes occur.</p> <p>The most that the consent authority could or should do in respect of this DA is to satisfy itself that the road proposed in this DA is capable of being part of a road network involving the other two proposed roads. In respect of Road 38 South, this is something which UGNSW's engineers</p>

<p>should be noted that to date no subdivision certificate has been lodged.</p> <p>Given that the intersection of Road 38 North, Road 38 South, Road 18, and Station Street will be delivered by 3 individual parties (UGNSW, applicant for 27-37 Delhi Road, and adjoining property owners) care must be taken to ensure that all levels are accurate and that the intersection will function. Accordingly, Council is of the opinion that the SSDA should include details demonstrating that the proposed Road 38 North, Station Street and Road 18 are capable of connecting. In this respect it is noted that the SSDA and supporting Transport Impact Assessment has identified that the Road 18 is to be left turn into Road 38 only. It is unclear whether the approved road boundary provides for this turning arrangement. This also supposes that the property owner of 39 Delhi Road will be capable or willing to limit this road to left only.</p> <p>With regards to public domain for all proposed roads, it is noted that Multi-Function Poles (MFPs) are required. Council has undertaken indicative work to identify where the MFPs need to be located. An indicative Lighting Plan showing the location of the MFPs, meter zones and meter boxes has been attached. The public domain finishes of the roads must be in accordance with Council's Public Domain Technical Manual. With regards to both proposed roads to be delivered it is noted that the subject sites are subject to car sharing which has not been detailed within the SSDA and associated plans. Further clarification on this matter is required and whether these spaces are to be located on the road or within the individual developments.</p> <p>Another matter to be clarified is where the intended vehicular access points will be for 1-17 Delhi Road. In this respect, the submitted plan indicates that there will be only one vehicular access point to 1-17 Delhi Road from Station Street. This must be further detailed and addressed as part of the SSDA.</p>	<p>and CGA's engineers, by detailed consultations pre-lodgement, have already ensured is the case. This is evidenced by the 2 letters dated 5 March 2014 from BGY North Ryde Pty Limited which were lodged with the DA and which the Council's submission appears to ignore. Likewise, the levels in the survey plan indicate that the road proposed in the DA is easily capable of being part of a road network which links to Road 18.</p> <p>The expanded carriageway which matches the proposed design of Road 18 is shown on the attached Site Layout and Grading Plan Number C3-02 Rev 5. UGNSW will consider accepting an appropriate condition requiring construction of the additional carriageway and traffic island as shown on this plan.</p> <p>UGNSW has not proposed that Road 18 will be permitted only to turn left into Road 38 because Road 18 does not form part of this DA. However, it is common ground in pre-lodgement consultations between UGNSW and TfNSW that, in order to prevent traffic from Riverside Park clogging Road 38 onto Delhi Road, if the Road 18 is ever joined to Road 38 in future, it should only be on the basis that traffic entering Road 38 from Road 18 can only turn left and not go straight ahead or turn right. However, that outcome cannot be secured under the current UGNSW DA as Road 18 does not form part of the land in the site of the DA. It is also incorrect to suggest that the left turn only arrangement can only be secured if the owner of 39 Delhi Road agrees. Once the road is opened, control of the road will be in the hands of the relevant road authority, namely the Council. The result is that UGNSW's DA should be considered on its merits now and that part of the future road network which is the subject of the DA should be put in place now.</p> <p>UGNSW will consider accepting an appropriate condition regarding MFP's and public domain finishes. The car sharing which the Council argues <i>"has not been detailed within the SSDA"</i> is irrelevant to this DA. Car sharing is a matter which should be dealt with in assessing future development applications for the built form of the relevant sites.</p>
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<p>The movement of cyclists must also be addressed. There does not appear to be any details regarding access for cyclists through the proposed roads. This must be clarified. In particular it is noted that Figure 13 of the NRSP DCP identifies a pedestrian I cyclist shareway extending along Station Street and pedestrian upgrade along Road 38. An extract has been provided below.</p> <p style="text-align: center;"><i>(Figure deleted)</i></p> <p>It should also be noted that the Parsons Brinckerhoff, North Ryde Station Precinct Project- Transport Management and Accessibility Plan, November 2012 (p. 151) identifies a need to 'investigate opportunities to improve pedestrian and bicycle access from the southern side of Epping Road at Pittwater Road to North Ryde Station'. This does not appear to have occurred. Clarity is required whether this is to take place at a later date or whether it is considered unfeasible or no longer necessary.</p> <p>It is noted that the Appendix A - Infrastructure Schedule of the Finalisation report for the North Ryde Station Precinct identifies a series of infrastructure items to be delivered. Council believes that clarification should be provided on the following items:</p> <ul style="list-style-type: none"> Item 5 - Connection of Road 38 and Lucknow Road in both directions to be undertaken by UGNSW or developer of Station site south. The proposed Transport Impact Assessment approves the limiting of Lucknow Road to one way but Council is of the opinion that the access designed as two-way, but some barricade system making the operation as one-way. This would allow Council to then revert the access into a 2-way street post implementation, after a review of the operation of this location. In this way, if the site is deemed as beneficial as being a 2-way, there will not have to be the opening of the roadway, just the removal of some sort of bollard/barrier scheme. 	<p>Vehicular access points to 1-17 Delhi Road should also be dealt with in assessing future development applications for the built form of the site.</p> <p>The development for which consent is sought in the DA does not increase the demand for or otherwise affect cyclists. It follows that there is no reason why the applicant should be requested to address matters relating to cycling in respect of this DA. Approval to the DA does not preclude completion of cycle networks in the future. A major element relevant to cyclists is the existence and design of the proposed overhead shared pedestrian/cyclist bridge across Delhi Road. At present, there is no cyclist or pedestrian access to the southern end of the Railway Station and no proposal by TfNSW to create one. UGNSW's development application in respect of the M2 Site seeks approval for a bridge which would deliver pedestrians and cyclist onto Delhi Road so that they can enter the Railway Station, however that development application has not yet been approved or implemented. The result is that UGNSW's DA in respect of the proposed Station Street and Road 38 North should be assessed on its merits now.</p> <p>The provision of Station Street and Road 38 as public roads as proposed in the DA does not increase the demand for, or otherwise affect or relate to, the Infrastructure Items listed in Annexure A to the Finalisation Report. It follows that the consent for this DA cannot, and should not, be conditioned with requirements in respect of those items. Although it is not strictly relevant to this DA, it is UGNSW's intention to provide, or to provide funding for others to provide, all of that infrastructure as part of UGNSW's development application in respect of the M2 Site. The Department is referred to that development application. However there is no reason why each of UGNSW's development applications should not be dealt with independently of each other.</p>
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	<ul style="list-style-type: none"> Item 7 - Provide passenger set-down/pick up and bicycle parking in Station Street. No bicycle parking is proposed as part of this SSDA. Clarification is sought whether this will apply to future development of 1-17 Delhi Road or this application. Item 9 - New bus facilities at Epping Road outbound stop at Delhi Road. Clarification is sought as to when this item is no longer required or when it will be delivered. Item 12 - Install way finding and directional signage throughout the precinct and as site entry points. Clarification is sought as to when this will be delivered. Item 19 - Pedestrian Plaza, Station Precinct minimum area of 2,000m². Clarification is sought as to when this will be delivered. Item 24 - Number of regional transport measures have been identified to reduce congestion in the Macquarie Park area including widening Delhi road and associated intersections, modifying the on-ramp from Lucknow Road to Epping Road, Modifying the Pittwater Road I Epping Road intersection. Clarification is sought as to when this will occur. It is noted that UGNSW have identified that this will be ultimately the responsibility of the RMS for their completion, but it is not identified within the SSDA. <p>With regards to the public domain to be delivered it should be noted that the dedication of these areas has not yet been finalised with Council. This is the subject of ongoing discussions with UGNSW.</p>	
19	<p>Station Street</p> <p>The proposed road design of Station Street fails to comply with the road design detailed within the DCP. The DCP controls provided at Section 4.1 Streets require Station Street to be a minimum width of 28.5m. The proposed design seeks to reduce this to 20.75m, resulting in a total reduction of 7.75m. This reduction is the result of:</p> <ul style="list-style-type: none"> Removal of the 3m swale in the centre of the street Reduced vehicle carriageway width from 4.5m to 3.25m Reduced footpath width from 6.5m to 3m. 	<p>UGNSW acknowledges that the proposed design of Station St does not comply with Figure 11 in the DCP. UGNSW's position is that the design of the road for which consent is sought is preferable to that described in the DCP for the reasons set out in the response in Row 17 above and elsewhere in the DA. UGNSW believes that a preferable route for the pedestrian/ cyclist network is to pass along Delhi Road and to gain access to and egress from the railway station at the only point at which exit from or entry to, the railway station is available, that is, on Delhi Road.</p>

<p>The proposed reduction in width is not supported. The reduction of the proposed footpath width is not considered appropriate as the NRSUAP has been predicated on non-car transport options such as cycling, walking and public transport. In this respect, to provide a positive pedestrian environment around the station, footpath widths should be as generous as possible. Furthermore, it is noted that the Station North Site will be developed in the near future and adaptability should be built into the infrastructure through generous footpaths to ensure that access to the station can be achieved from Station Street. The prioritisation of pedestrians as identified in the Parsons Brinckerhoff study can only be achieved where reasonable and appropriate footpaths are provided.</p> <p>Should the reduction in the width of the footpath continue to be pursued it must be predicated on further information being submitted which details pedestrian movements in the context of local attractors, foot traffic generators and desire lines. This would need to consider the following:</p> <ul style="list-style-type: none"> • Termination point of the footbridge over Delhi Road and anticipated pedestrian movements, • Local facilities and amenities, • Open space to be delivered on 27-37 Delhi Road, and • Potential and existing access points to North Ryde Station <p>With regards to the deletion of the swale, Council's stormwater engineers have not identified any issues with this on stormwater grounds. However, with regards to traffic movements, the swale would have prevented u-turning within Station Street. Alternate treatment methods such as a median strip may be required to prevent U- turns. This is of particular concern given that the proposed shared way has not been designed to allow for vehicle passing. It must also be considered whether the prevention of right turns into the vehicle entrance to Station Site North is required. The deletion of the swale results in the removal of street tree planting and vegetation which significantly changes the character of Station Street. It is noted that the</p>	<p>There is no utility in providing a pedestrian/cyclist link to Station Street as there is no access to the rear of the railway station and no proposal by TfNSW to provide such access. Any person delivered to the turning head in the proposed Station Street must depart from that point and proceed onto Delhi Road in order to access the railway station. The Department is also referred to the comments above in respect of UGNSW's development application in respect of the M2 Site.</p> <p>For the reasons set out above and in the DA, UGNSW believes the proposed design of Station Street is appropriate.</p> <p>It is unreasonable and impractical for the applicant to address the dot points opposite as they involve matters which are not presently known and involve issues which are not environmental effects of the development for which consent is sought in this DA.</p> <p>The Robert Bird Group report lodged with the DA demonstrates that removal of the swale and provision of on-street bio-retention is an appropriate alternative means of achieving the water quality treatment targets set out in the SWMP.</p>
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<p>Transport Impact Assessment identifies that this planting has been recovered elsewhere in the NRSP but that this has yet to be detailed. This potential loss of greenery should be avoided.</p> <p>The overall reduction in the width of Station Street should not be considered purely on vehicle and pedestrian usability alone but it should also be recognised that the width of the road has been provided due to the significant building heights delivered under the NRSP. The road allows for much needed separation between the Station Site North and the Station Site South. Any proposed reduction in the width of Station street must be carefully considered, especially given that there are no details regarding the building heights or treatments for future development of 1-17 Delhi Road.</p> <p>In addition to the above, it is noted that Council has received a referral from Roads and Maritime Services (RMS) in response to the DA lodged for 27-37 Delhi Road. This referral has stated:</p> <p style="padding-left: 40px;"><i>Transport for NSW (TfNSW) has previously advised that Station Street, should be designed to accommodate a turning circle for buses. It is noted that the turning area has not been designed to accommodate buses and has a 12.5 metre radius turning head. TfNSW advises this should be at least 20 metres to allow buses to turnaround.</i></p> <p>As such, it is presumed that the shared area must be amended in design to allow for buses. Should buses be required to have access along Station Street, location and details of proposed bus stops and associated infrastructure must be provided. The provision of buses through the shared way must be carefully considered to ensure that pedestrian safety is not at risk.</p> <p>With regards to the proposed shared way and the submitted Signage Plan, it is considered that additional entry signage for the Shared Zone is required. Furthermore, the signage should be</p>	<p>There is no reason why a 12.5m long rigid bus should enter the proposed Station Street and no reason why UGNSW should accommodate this objective. Please refer to Page 22 of the Transport Impact Assessment lodged with the DA.</p>
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<p>coordinated with the proposed MFPs as identified in the attached Lighting Plan. Any proposed signage plans would need to be considered by the Traffic Committee. The updated signage plan can be reviewed by Traffic Committee on 31 July 2014, however this would need to be provided to Council by 16 July 2014. Additionally, given that the submitted plans have identified a singular vehicle entry point for the Station Site North, the shared zone must allow for access by Council's Waste Truck. Should the Department not support the request of Transport for NSW to widen the turning head to 20m, a swept path analysis for a medium rigid vehicle (9.8m truck) must be provided. In addition to the above, it is noted that the swept path analysis indicates that there will not be sufficient space for vehicles to pass one another in the same direction along Station Street. This is of significant concern given that this area is likely to be used for drop-off/pick-ups which may require some waiting time. It must also consider what will occur should a vehicle breakdown within the shared way. It is also noted that the 1/6 ramp grade will not comply with current design practices with respect to ramp face grades on a raised threshold area for pedestrian use (refer to RMS technical direction TDT 2001/04a). It is also noted that no public domain works are proposed to the north and west of the shared way. It must be clarified where the proposed shared way will be accessed from. Particular reference is made to the pedestrian bridge over Delhi Road and whether it is proposed that there will be any form of access to this bridge.</p> <p>A critical concern with the proposed design for Station Street is that there appears to be little co-ordination between the proponents of 27-37 Delhi Road and the submitted SSDA documentation. Council has been advised that there has been meetings and discussions between both applicants but that this does not appear to have been fully detailed or realised in the overall design of the proposal. Key areas of concern include:</p> <ul style="list-style-type: none"> • Ambiguity between the levels of the public domain and associated work under the SSDA and 27-37 Delhi Road, 	<p>The Transport Impact Assessment lodged with the DA (page 22) indicates that the Council's 10 metre long rigid waste vehicle can negotiate the proposed Station Street. Please also refer to the swept path analysis in Drawing C3-03 lodged with the DA.</p> <p>The submissions opposite involve issues as to built form and other infrastructure which are not resolved at present. UGNSW's position is that the DA should be assessed now on its merits.</p> <p>The purported "key areas" are not matters which the applicant could, or should, be required to resolve in the course of assessment of the DA. The</p>
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<ul style="list-style-type: none"> • Lack of coherence in the design of Road 38. • The proposed shared way, one way system around park to be delivered as part of 27-37 Delhi Road. <p>Road 38</p> <p>As identified previously it should be noted that the proposed development for 27-37 Delhi Road proposes a total width of 15m (boundary to boundary). This is below the width of 17.5m required under the NRSP DCP 2013. This causes some concern regarding how the intersection of Station Street, Trinity Road link and Road 38 is to function.</p> <p>In Council's opinion the proposed Road 38 should comply with the requirements of the DCP, which requires a minimum width of 17.5m. However it is noted that the proposed road includes 3 trafficable lanes at the intersection of Road 38 and Delhi Road, which is different to that nominated within the DCP. This must be maintained in order to facilitate sufficient vehicular movement. It is noted that the proposed Road 38 design does not allow for a footpath along the eastern edge of the road. This is not supported and Council recommends the provision of a footpath a minimum of 3m in accordance with the NRSP DCP 2013. Given the volumes of traffic likely to utilise Station Street as a drop off / pick up zone and potentially generated from 27-37 Delhi Road, it is recommended that the proposal incorporate supplementary traffic management equipment such as advanced loop detectors to assist in traffic management of the traffic signals at intersection of Road 38 and Delhi Road. This could be located in Station Street or Road 38. Further to the above, the concerns regarding the intersection of Station Street and Road 38 detailed within the Station Street section of this submission apply.</p>	<p>applicant has no power to control development on sites which it does not own.</p> <p>For the reasons set out above and in the DA, UGNSW believes the proposed design of Road 38 North is appropriate.</p> <p>The Department is referred to the comments above in respect of the 3 proposed streets referred to in the Council's submission. The contents of a development application in respect of other land owned by a person other than the applicant are not a relevant matter in determination of this DA. Likewise, the Council's "concern" regarding the intersection is not a matter which should be considered in the assessment of this DA. UGNSW points out that its DA provides for greater than 17.5 metre minimum width in that part of Road 38 which is the subject of this DA, that is, Road 38 North. Please refer to civil drawing C3-15.</p> <p>UGNSW's position is that the traffic generated by the proposed development of 27-37 Delhi Road is a matter to be considered in assessing the development application for that development, not UGNSW's DA.</p>
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20	<p>Biodiversity</p> <p>It is noted that the proposal did not include a Street Tree Plan as identified within the NRSP DCP 2013. The submitted Landscape Plan does not provide any details regarding species or tree pit details. These should be detailed in accordance with the requirements of the NRSP DCP 2013 and Council's Street Tree Masterplan 2013. In this respect, Council is of the opinion that at least two of the following species should be planted:</p> <ul style="list-style-type: none"> • Angophora costata (Smooth Barked Apple) • Eucalyptus haemastoma (Scribbly Gums) • Eucalyptus racemosa (Snappy Gum) • Corymbia eximea (Yellow Bloodwood) • Melaleuca decora (White feather honey myrtle) • A/locasuarina torulosa (Black She oak) 	<p>This is not so. The submitted landscape Plan clearly specifies that “<i>Street species shall be in accordance with Ryde City Council Street Tree Master Plan</i>”.</p> <p>UGNSW will consider accepting an appropriate condition specifying tree species.</p>
21	<p>Flooding and Stormwater</p> <p>In considering the proposed stormwater infrastructure for the site, Council has been liaising with the Robert Bird Group. To date, Council is unable to finalise the review process due to the following reasons:</p> <ul style="list-style-type: none"> • There is an inconsistency in the flow rates detailed in section 4.5 of the Stormwater Management Plan and the DRAINS model flow rates. Council is awaiting the provision of the DRAINS model to further investigate this discrepancy. • The time of concentration of 5 minutes was used for all sub catchments in the DRAINS mode. Using a time of concentration for a catchment area of 0.626 ha is unusual. Therefore, City of Ryde has requested to submit the time of concentration calculation sheet for the sub catchments. 	<p>Since these submissions were prepared, Robert Bird Group has provided the Council’s engineering staff with all relevant responses to matters raised by them.</p> <p>If it were considered appropriate by the Department, UGNSW would consider accepting an appropriate condition requiring UGNW to provide Council with copies of the calculations used in designing the stormwater infrastructure.</p>
22	<p>Utilities & services</p> <p>Council's records indicate that the subject site is affected by easements (including but not limited to access right-of-ways and drainage easements).</p>	<ol style="list-style-type: none"> 1. This submission appears to be in error because DP104833 (copy attached) relates to land at Tenterfield and is therefore irrelevant. If this was intended to be a reference to DP

	<p>These are identified in DP 1131774, DP 1187161, and DP 104833. It is noted that Drawing Number C0-01 Revision 4 prepared by Robert Bird Group includes a note that details of easements are contained in the Schedule of Easements and Stratum Statements on DP and Title Documents. Whilst this plan shows some of the easements it does not include an easement under DP 104833 which provides access to an existing substation located on the site. This easement must be addressed under any forthcoming development application. With regards to the proposed utilities Council has provided an indicative Lighting Plan which includes meter boxes and zones. This must be compatible with the proposed utility connections.</p>	<p>1043038(copy attached), which is relevant to the Site, there is no point in depicting the Right of Way Variable Width created by DP 863893 on Drawing Number C0 01 Revision 4.</p> <ol style="list-style-type: none"> 2. The Council's claim that <i>"This easement must be addressed under any forthcoming development application"</i> is, patently, not a matter which is relevant to this DA. 3. It is intended that the final electrical circuit design will satisfy Ausgrid's requirements in a manner which is compatible with Council's reasonable requirements concerning street lighting.
23	<p>Construction & operation impacts</p> <p>Council is of the opinion that a Preliminary Construction Management Plan should be prepared prior to the approval of the SSDA. This is to allow Council to understand the area of impact as a result of the proposed construction activity. A Preliminary Plan is required as the development is expected to generate a large movement of trucks. This is anticipated to have a large scale impact on the traffic network. Alternatively should the proposal be subject to conditions, this may be required prior to issue of any Construction Certificate and provided to Council's satisfaction.</p>	<p>UGNSW believes that a Construction Management Plan, preliminary or otherwise, has no relevance to the assessment required to consider and determine the DA. For this reason, UGNSW believes that no Construction Management Plan should be required unless the DA is approved. This is because the construction development proposed in the DA is the straightforward construction of a relatively minor road and related ancillary matters. There can be no suggestion that the environmental impact of the construction process is so serious or critical that it presents issues which need to be taken into account in determining whether or not to grant consent or whether or not to impose special or unique conditions to mitigate construction related impacts.</p> <p>This is not to suggest that the impacts of the construction process should be ignored. UGNSW's position is quite to the contrary. UGNSW believes that a Construction Management Plan should be required, but only pursuant to a condition of consent which requires an appropriate Construction Management Plan prior to commencement of construction.</p>

		UGNSW will consider accepting an appropriate condition requiring preparation of an appropriate construction management plan prior to commencement of construction. Please refer to Section 6 of the EIS.
	MATTERS RAISED BY DEPARTMENT OF PLANNING and ENVIRONMENT	
24	<ul style="list-style-type: none"> The deletion of the cycleway and swale 	<p>As indicated in the responses in Rows 1.5 and 1.7 above, the cycleway has not been “deleted”. However, as explained, the proposed cycleway link contemplated by the North Ryde Station DCP is not part of this DA. In accordance with the desirable flexibility recognized in Part 1.7 of the DCP, it is UGNSW’s intention to provide the cycleway link in another , more useful, location by another development application.</p> <p>The swale, as identified in Figure 11 of the DCP, has been deleted as:</p> <ul style="list-style-type: none"> The highly constrained dimensions of the North Ryde Station North and South Sites have the result that it would be sub-optimal to attainment of the objectives of the UAP to design Station Street in accordance with Figure 11 of the NRSP DCP 2013 It was considered adequate to have only two rows of parallel landscaping in Station Street, rather than 3 rows. The owner of the North Ryde Station South Site was not prepared to agree to provision of the extra road width required to include the swale in the design of Station Street because a wider street would make it difficult to provide the minimum area of open space mandated by the DCP within the North Ryde Station South Site. Without that agreement , UGNSW has no other acceptable means of delivering a public road comprising the proposed Station Street . All stormwater quality objectives can be achieved notwithstanding deletion of the swale.
25	<ul style="list-style-type: none"> Reduced pedestrian footpath width 	The 6.5 metre footpath shown in Figure 11 of the DCP has been reduced to 3 metres because of:

		<ul style="list-style-type: none"> as advised above, the cycleway link is proposed to pass along Delhi Road and this will mean that a 3 metre wide shareway would be adequate for all bicycle traffic which may occur in Station Street if it is not part of a through-way link forming part of the Macquarie Active Transport Spine between Macquarie University and Riverside Corporate Park; removal of the formerly proposed pedestrian crossing east of the turning area and addition of a proposed pedestrian crossing on Road 38 south of Station Street. The proposed location of that pedestrian crossing does not form part of this DA because this DA does not include construction of the proposed road intended to form Road 38 South. The construction of Road 38 South was included in CGA's development application to Ryde Council and issues of this kind are best considered in the context of that application. UGNSW considered that the amount of land area required to accommodate the 6.5metre footpath would impose substantial limitations on the future development envelope of the Station North Site, especially given the various easements setbacks and rail infrastructure on site. Furthermore, the owner of the North Ryde Station South Site was not prepared to agree to provide any further land area to accommodate a footpath wider than 3 metres because a wider street would make it difficult to provide the minimum area of open space mandated by the DCP within the North Ryde Station South Site. Without that agreement, UGNSW has no other acceptable means of delivering a public road comprising the proposed Station Street.
26	<ul style="list-style-type: none"> Reduced westbound lane width 	<p>The westbound lane shown in Figure 11 of the DCP is at 4.5 metres to allow traffic to maneuver past a broken down vehicle. As the central swale has been removed in the design in the DA, the traffic constriction which it presented is also removed and this means that there is no need for the westbound lane to be wider than 3 metres.</p>

27	<ul style="list-style-type: none"> Associated implications on amenity and accessibility 	UGNSW considers the amenity of the proposed Station Street to be acceptable. The design of Station Street is able to accommodate City of Ryde's garbage trucks and a NSW Fire Brigades general access appliance. Although it cannot accommodate a 12.5 metre rigid bus or truck, for the reasons set out in pages vi and 22 of the Traffic Impact Assessment Report, there is no reason why such a vehicle needs to enter the proposed Station Street.
28	<ul style="list-style-type: none"> Additional information to demonstrate that the design has regard to Road 38 and Road 18 located within adjoining sites 	Please refer to the responses in Rows 17 & 18 above.
29	<ul style="list-style-type: none"> Options to provide a footpath on the eastern side of Road 38 	No footpath on the eastern side of Road 38 is proposed in the DA. However, as advised above in Row 17, in response to the Council's submission, UGNSW is prepared to consider accepting an appropriate condition of consent requiring construction of a footpath on the eastern side of Road 38 as shown in the Site Layout and Grading Plan Number C3-02 Rev 5 (copy attached). As the tree pits on the eastern side of Road 38 have been removed in this drawing, it will be necessary to include provisions which permit the applicant to achieve the required water quality objectives by alternative means. As set out in the response in Row 17 above, site constraints, particularly the distance between the south eastern corner of Lot 3 in DP 1131774 and the western boundary of Lot 21 in DP1003588(the Stockland Site) do not permit retention of the tree pits on the eastern side of Road 38 if the additional footpath is constructed.
30	<ul style="list-style-type: none"> Consideration of issues raised by Transport for NSW in relation to the proposed road design to cater for expected vehicles/ buses, improvement of pedestrian /cycle links and suitability of proposed kiss and ride area. 	Please refer to the responses in Rows 1 to 15 above.
	SUBMISSIONS RECEIVED FROM THE COMMUNITY	
	Submission by Catherine Chan – Resident of North Ryde	
31	Objects to this project	

<p>As a local resident of North Ryde I wish to object strongly to the size of the proposed North Ryde Station Precinct Development (Station North and Station South Sites).The main reason is that already, our community cannot "move" during peak hour traffic, and we currently have our narrow suburban streets used as car parks, causing great concern for residents of Ryde. When you turn into your local streets, car's are parked on both sides of the road all day, as their owners go off to work on either the train (nowhere to park to catch North Ryde Train) or the bus. Almost every day as you turn into the streets that lead to where I live, you almost have a head on collision. Every day a gridlock occurs with at least one car having to reverse back for many metres to allow the other car to pass! Angry drivers abuse you, it is a major problem. I have written to the council previously in regards to this matter. This development states that there will be 3000 more homes created, how on earth can our area cope with this influx of people and their cars. Already to leave my home and travel to Wahroonga at approximately 8.20 am, it can take me almost 20 - 30 minutes just to get to Lane Cove Road, from Betty Hendry Parade. This is using Epping Road, and supposedly travelling against the peak hour traffic. Alternatively, if you choose to shop at Macquarie Shopping Centre and leave to come home after 4pm, it can take you almost 40 minutes to travel 3 kms, and again this is supposedly travelling against the peak hour traffic. Already there are major developments of apartments going up near Macquarie Centre, with more about to start being built near the Lane Cove Road/Epping Road intersection, not to mention all of the apartments being build along Mowbray Road on the way to Chatswood. As I drive to work along Lane Cove Road towards West Pymble, I look at all of the traffic just stopped every morning heading to Macquarie Park. It is just like looking at a car park! I am not opposed to development nor am I to change, however, I just feel that at the moment there is so much development going on which is being fueled by the housing boom, and once it happens there is no going back. There are just too many cars/people for our current infrastructure, and by just changing a few roads or the access into roads is not going to fix</p>	<p>The “size” of the Station North and South Sites, or the “size” of the future development on them is not affected by the development for which consent is sought in the DA except in respect of the GFA allocation. The GFA allocation sought is entirely in accordance with the Department’s mandate in the Finalisation Report.</p> <p>The traffic environment both at present, and in the future when the dwellings contemplated by the Finalisation Report are constructed, has been considered by the Department and the Minister prior to preparation of the Finalisation Report. In pursuing the DA, UGNSW is attempting to implement a part of the outcomes mandated in the report.</p>
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	<p>the problem. We will all suffer, more than we are now, and that is hard to imagine. I understand people need housing, but this proposed development is just far too big for our area to support. Also, North Ryde and Ryde are areas where people from all over Sydney pass through when travelling from East to West and North to South. We are at saturation levels now. I just hope that common sense will prevail, and that the development can proceed, but on a smaller, lower rise level, one that is much more in keeping with our area, as it used to be a great place to live!</p>	
	Submission by Corina Seeto – Resident of North Ryde	
32	<p>Objects to this project</p> <p>The North Ryde train station currently does not include ANY parking for CARS or BICYCLES. There is no public transport (bus) link for North Ryde residents to travel from the township to the station.</p> <p>I would love to be able to catch the train to work but can not do so until the parking situation is addressed. Many of neighbours have expressed the same frustration.</p> <p>Any development to the North Ryde station area should first address commuter parking. Following which you have my support for further residential and commercial dwellings.</p> <p>COMMUTER PARKING - should be available in abundance to cater for current and future residents to access the under-utilised North Ryde station and reduce traffic on the heavily congested Mowbray Rd, Delhi Rd and Epping Rd.</p> <p>PRIORITISE PARKING FOR BIKES to further encourage more cars off road around the station area. Having a large secure and free bike parking area immediately next to the station sends a positive message to the community.</p>	<p>This DA is confined to the provision of roads, subdivision and allocation of GFA rather than bicycle and car parking. UGNSW believes that parking should be addressed when assessing development applications for consent to dwellings and other traffic generating development.</p>

	<p>PARKING FOR CARS will also help creating a sustainable transport network. I would suggest making sure there is ample free parking for commuters - but ensuring that residents in nearby dwellings (as per current development submissions) are NOT able to leave 2nd cars in these spaces. Perhaps 12hrs free?</p> <p>Please don't hesitate to contact me for any further consultation.</p>	
	Submission by Tricia Tonazzi – Resident of North Ryde	
33	<p>Objects to this project</p> <p>I object to the height and size if this proposal.</p> <p>You are not providing adequate car spaces for these residents, 1 carapace per unit, all other cars parked around local streets.</p> <p>What provisions have been made for schools, the local schools are at capacity as is, same with local hospitals. Our roads...just try get onto epping rd from pittwater rd in the morning, now lets add another 800 cars as we all know these residents aren't all going to travel by rail.</p> <p>And that is just to start with..</p> <p>Has the city if ryde not provided enough housing recently, with top ryde, and meadow bank developments, might I add none at these crazy heights that have been proposed for north ryde station precinct</p>	<p>Given that the DA is confined to the provision of roads, subdivision for the roads and GFA allocation, UGNSW believes that the matters raised in this submission are not relevant to the development for which consent is sought in the DA.</p>
	Submissions by Gerhard & Jane Rungworth – Residents of North Ryde	
34	<p>One Submission</p> <p>We have lived in Nth Ryde with our children for 22 years and my wifes parents have lived in Farrington Pde Nth Ryde for 60 years. We have seen many changes but nothing of the scale and bulk of this development right on our door step.</p>	<p>Both of these submissions are objections to the North Ryde Station Rezoning Proposal and its built form density rather than objections to UGNSW's development application which is confined to the provision of roads, subdivision for the roads and GFA allocation.</p>

<p>The development will be visible from any location in North Ryde particularly the 27 floor building next to the 6 floor Microsoft building at the corner of Pittwater Rd and Epping Highway.</p> <p>We Strongly object to the North Ryde Station Precinct Rezoning Proposal.</p> <p>The reasons for our objection include:</p> <p>The extreme building heights, density and lack of open space:</p> <p>Within the current design, there are no considerations for the existing community of North Ryde in terms of additional open space. Instead, the proposal intends to remove existing open recreational space from the community. The building heights proposed will create shadows over residential houses, childcare settings and a school. The heights must be reduced to a reasonable level and be capped at medium density so it is no higher than its surrounding commercial buildings.</p> <p>Traffic: Traffic congestion is a nightmare already due to the development of the Macquarie Park Commercial area. Tens of thousands of people and cars come to our area every day for work and the addition of thousands of more cars and people will only cause grid lock for all. The notion that everyone is going to live at this development and catch the train to Macquarie Park for work or riding bikes or walking is ludicrous. The bulk of people that work in the local area do not live here. My neighbour works in Macquarie Park and it takes up to half an hour to drive the 3kms.</p> <p>The reports presented do not provide any solutions. The site roads issuing to Epping Road and Macquarie Business Park will be further exasperated in peak hours. Further studies need to be prepared for the entire area to understand the full impact of proposed developments. We note also that the Planning Assessment Commission (PAC) rejected the Allengrove Cres Development in 2012 for reasons including the adverse impact the 200+ apartments would have on the already congested local</p>	
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	<p>roads. The North Ryde Station Precinct is located only 800m from the Allengrove Development and yet is 10+ times the density.</p> <p>Accessibility to train station: The development site, adjoining North Ryde train station is an ideal place for a transport interchange rather than high rise housing. A substantial car park and bus interchange could be constructed to enable better use of public transport while taking traffic from the M2 off Epping Road. North Ryde is the only station on the line that has sufficient space for such a transport-oriented facility. The M2 site was set-aside back in the 1950's for transport use and would be ideal for such a transport interchange.</p> <p>Our hospitals, police and schools, both public and private are at capacity: The figures used by the DPI are incorrect and out dated. For an area, which has schools both public and private currently at capacity, there are no provisions for new schools for approximately 2,750 dwellings (consisting of 1, 2 & 3 bedrooms, including student accommodation and serviced apartments).</p> <p>Inadequate community consultation: For a \$1-2bn project that has been described by Transport for NSW as being comparable to Barrangaroo, the community consultation, has and continues to be woefully inadequate. This is contrary to the White Paper policy that requires community consultation at the strategic level. The two drop-in sessions provided to the community was a presentation implying what was to come, rather than an opportunity for the community to provide meaningful input. The final session at the Council Chambers recently raised more questions than answers.</p> <p>I have no issue with some development of the site bordered by the M2 and Epping Rd but it needs to be of a scale that does not take away from the surrounding bush land and dwarf the commercial building. Any approval of this scale opens the door for the commercial land holders to increase building heights to 27 stories to maximize their profits like all developers.</p>	
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<p>North Ryde has done more than its fair share for Sydney with the commercial buildings already here at Macquarie Park and CSIRO corporate park.</p> <p>These current buildings blend in like the micro soft building but the proposed 27 floor tower proposed will be an eye sore for all residents and create more problems for local residents as noted above.</p> <p>Please decline this proposal</p> <p>Another Submission</p> <p>We have lived in Nth Ryde with our children for 22 years and my wifes parents have lived in Farrington Pde Nth Ryde for 60 years. We have seen many changes but nothing of the scale and bulk of this development right on our door step. The development will be visable from any location in Nth Ryde particually the 27 floor building next to the 6 floor Microsoft building at the cnr of Pittwater Rd and Epping Highway.</p> <p>We Strongly object to the North Ryde Station Precinct Rezoning Proposal.</p> <p>The reasons for our objection include:.</p> <p>The extreme building heights, density and lack of open space:</p> <p>Within the current design, there are no considerations for the existing community of North Ryde in terms of additional open space. Instead, the proposal intends to remove existing open recreational space from the community. The building heights proposed will create shadows over residential houses, childcare settings and a school. The heights must be reduced to a reasonable level and be capped at medium density so it is no higher than its surrounding commercial buildings.</p> <p>Traffic: Traffic congestion is a nightmare already due to the development of the Macquarie Park Commercaill area. Tens of thousands of people and cars come to our area every day for work and the addition of thousands of more cars and people will only cause grid lock for all. The</p>	
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	SUBMISSION BY ENVIRONMENT PROTECTION AUTHORITY	
	Water Quality	
35	<p>1 Water Quality</p> <p>1.1 Stormwater Management</p> <p>The Integrated Water Management Plan (IWMP) consists of a stormwater treatment train comprising of on street level treatment and subdivision/development treatment measures in order to meet water quality objectives for the development. The Environment Protection Authority (EPA) supports this approach, however the EPA recommends that a condition of approval be secured that requires the design and implementation of a monitoring program to ensure that the treatment train is performing as predicted to validate the water quality objectives are being met.</p> <p>The success of the IWMP will be dependent upon ongoing monitoring and maintenance of the stormwater treatment train. The submitted IWMP also recognises the importance of these actions to ensure their effective ongoing performance. However, the</p>	<p>As the proposed roads will be public roads, owned and managed by the relevant road authority, namely Ryde City Council, and subject to the Council's maintenance standards, UGNSW does not support this approach.</p>

<p>submitted information does not provide any information on who will be responsible for the management of these stormwater management features post development. In this regard, the EPA recommends that the Department of Planning & Environment (OPE) should seek additional information from the proponent on who will be undertaking these roles post development including any in perpetuity funding arrangements. The EPA suggests that the proponent may wish to seek environmental commitments as part of a VPA process which could also be linked to developer contributions.</p> <p>A Soil and Water Management Plan should also be developed and implemented prior to construction in accordance with the <i>Managing urban stormwater: soils and construction, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C. Unsealed roads; D. Main Roads; E. Mines and quarries)</i> (DECC 2008).</p> <p>2 Construction Noise</p> <p>Any potential noise impacts associated with construction should be assessed and any appropriate noise mitigation measures identified and implemented. Any local residents or noise sensitive receivers should be considered. In this regard, we recommend the proponent consult the Interim Construction Noise Guideline (DECC, 2009). A copy of this guideline is available at: http://www.environment.nsw.gov.au/noise/constructnoise.htm.</p> <p>3 Contaminated Land</p> <p>The Environment Impact Statement (EIS) states that a Phase 1 and Phase 2 Assessment was prepared in 2012 during the UAP process in order to determine the presence and extent of potential site contamination. This assessment was not</p>	<p>UGNSW proposes that, in keeping with the system of ownership and control which has been in place in NSW for approximately 100 years, responsibility for management of the public road will be the responsibility of the relevant road authority, namely Ryde Council. The EPA's suggestion is rejected as no VPA process is contemplated.</p> <p>UGNSW will consider accepting an appropriate condition requiring preparation of an appropriate Soil and Water Management Plan prior to commencement of construction.</p> <p>UGNSW will consider accepting an appropriate condition requiring preparation of an appropriate Construction Management Plan prior to commencement of construction.</p>
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<p>included with the EIS, however these investigations revealed that there is generally low potential for contamination on the site.</p> <p>The EPA recommends that the proponent should consider whether this assessment and any proposed remediation strategies are still adequate based on the proposed development. In this regard, the proponent may wish to request the services of an accredited site auditor. The proponent should also consider any requirements and procedures in the following:</p> <ul style="list-style-type: none"> • Contaminated Land Management Act 1997; and • Contaminated Land Management Regulation 1998. <p>4 Waste</p> <p>The EIS states that a detailed Construction Management Plan will be prepared prior to the commencement of the construction works and will provide detailed waste management practices and procedures. In this regard, the EPA recommends that any waste generated during demolition/remediation/construction is classified and managed in accordance with relevant legislative requirements and the EPA Waste Classification Guidelines (DECCW 2009).</p> <p>5 Future Development of Land</p> <p>The proposal is seeking approval for subdivision of land that will deliver future high density residential apartment, retail and commercial uses and open space and public domain. While the proposal does not include a concept plan for this future development, the EPA recommends that DPE should be advising the proponent that a range of environmental matters should be considered as part of any future</p>	<p>Having regard to the fact that the DA is for a road, rather than for residential or commercial use of habitable land, UGNSW submits that issues pertaining to the risk of contamination were adequately dealt with in the EIS. In addition, an unqualified site audit statement (copy attached) has been obtained for the whole of Lot 4 in DP 1131774, although no site audit statement has been obtained by UGNSW for Lot 160 in DP 1136651.</p> <p>The EPA's recommendation is noted.</p> <p>As the Department is already aware, both the Department and UGNSW are aware of these matters. In the present context, that is the assessment of the current DA, no further response appears necessary and any relevant matters raised in the submission can be addressed in the context of development applications for the proposed built form on the Site..</p>
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<p>development application process. These include but not necessarily limited to the following:</p> <p>Road Traffic Noise and Air Quality</p> <p>With a subdivision proposal that will involve an increase in residential densities in conjunction with commercial activities the proposal will be a major traffic generating development. In this regard, the impacts from road traffic noise need to be assessed to determine whether noise mitigation measures are required in order to satisfy the NSW Road Noise Policy (DECCW 2011).</p> <p>In addition the proposed development is in close proximity to the M2 Motorway. Residential development next to busy roads (with an annual traffic volume of over 40,000 vehicles per day) would be required to meet the internal noise goals in the Infrastructure SEPP 2007. In addition the Development Near Rail Corridors and Busy Roads -Interim Guideline should also be consulted. This guideline includes goals for internal noise levels based on World Health Organisation guidelines for residential and other sensitive developments along busy road corridors to protect health and amenity. This guideline recognises judicious land use planning, architectural design, building orientation and good internal layout that can achieve acceptable acoustic amenity and minimise exposure to poor air quality in close proximity to busy transport corridors.</p> <p>Future Water Quality and Management</p> <p>Consistent with 1.1 above with a significant intensification of activities being proposed for the site it is recommended that an integrated approach for water management at the site should be developed and implemented. In particular with considerable areas of sealed area, the need for management of polluted stormwater runoff and the collection of roofed rainwater, water sensitive urban design principles should be</p>	
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	<p>applied to the development. In this regard, the EPA recommends that Council should include as a requirement in any condition of approval in relation to stormwater management, the demonstration that these principles will be met.</p> <p>Sewage Management</p> <p>Information should be provided on whether the existing sewage reticulation system can cater for any new additional load in relation to the future development of the site. Information should be sought on whether any additional load will impact the systems' environmental performance especially in relation to sewage overflows from any existing sewage pumping stations and discharges from any associated Sewage Treatment Plant. The EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be minimised. Sewage overflows have been identified as one of the major contributors to diffuse source water pollution in urban environments. The receiving waters that would potentially be impacted in any adverse scenario include Lane Cove River and Sydney Harbour.</p> <p>Section 47 of the Protection of the Environment Operations (POEO) Act 1997 defines scheduled development work as 'work at any premises at which scheduled activities are not carried on that is designed to enable scheduled activities to be carried on at the premises'. Under Section 47 of the POEO Act it is an offence for scheduled development work to be undertaken without an environment protection licence. If the sewage reticulation installed as part of the proposed development will be connected to the existing sewage system licensed under the POEO Act when completed, then the proposed reticulation will form part of that licensed system and will be considered to be a scheduled activity. Construction of the proposed reticulation would therefore constitute scheduled development work under the POEO Act and must not be</p>	
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undertaken without an environment protection licence in place prior to the commencement of construction. The proponent should investigate the requirement for construction of the proposed sewage reticulation to be licensed under the POEO Act.

Future Waste Management

NSW State Plan 2021 Goal 23 requires an increase in recycling to meet the 2014 NSW waste recycling targets. Increased recycling limits the amount of space required for landfill and turns waste into a valuable resource. In addition, Goal 23 also requires that by 2016, NSW will have the lowest litter count per capita in Australia. The cost to the community of littering goes beyond visual pollution. Greater respect for neighbourhoods by disposing of rubbish properly leads to improved safety, limits health impacts and protects the natural environment. These goals also need to be the cornerstones of waste management strategies as part of the development.

The EPA recommends that the proponent consult the NSW EPA's *Better Practice Guidelines for Waste Management and Recycling in Commercial Facilities* (Dec 2012) in order to implement best practice waste management initiatives. This guidance will assist in providing approaches to improve recycling rates for office and commercial facilities. It will also ensure typical waste and recycling vehicle access and turning provisions are provided in any sub-division layout and building design. This document can be accessed at:

<http://www.epa.nsw.gov.au/warr/ProdStewardshipEPR.htm>.

In addition *the Better Practice for Public Place Recycling* (DEC 2005) should also be consulted as it provides information on standard recycling systems for public places, such as parks, shopping centres, footpaths, bus-stops, etc.

	SUBMISSION BY SYDNEY WATER CORPORATION	
36	<p>Water</p> <p>The drinking water main available for connection is via the 250mm and 200mm mains off the rising main from Ryde Pumping Station (WP0005) to Chatswood reservoir (WS0239)</p> <p>The current flow and pressures available for fire-fighting purpose will need to be maintained in the vicinity of this development as a requirement for RailCorp, therefore a new 150mm main in parallel to the existing 150mm main, along Delhi Road is required in order to supply this high density development (see figure 2)</p> <p>Detailed requirements will be provided at Section 73 phase.</p> <p>Wastewater</p> <p>The wastewater main available for connection is the 225mm main as shown on figure 1</p> <p>Where proposed works are in close proximity to a Sydney Water asset, the developer may be required to carry out additional works to facilitate their development and protect the wastewater main. Subject to the scope of development, servicing options may involve adjustment/deviation and or compliance with the Guidelines for building over/adjacent to Sydney Water assets. A WSC can provide details of requirements</p> <p>Detailed requirements will be provided at Section 73 phase.</p>	<p>The requirement for a new parallel main has not been indicated by Sydney Water in previous consultation for site servicing. The extent of this parallel 150mm main is not clear. It appears that any requirement of this kind is not a response to the DA but is, instead, a matter which should be considered only in the context of a development application for built form on the Station North and South Sites. If so, it should be considered in that context and not in respect of this DA. In any event, this can be dealt with by a Water Services Coordinator in the course of an application for a compliance certificate under S73 of the Sydney Water Act and need not delay assessment of the DA.</p> <p>Should development impact on Sydney Water assets, additional works will be undertaken to protect or divert wastewater assets in accordance with routine Sydney Water standards and approval processes.</p> <p>Noted.</p>