

SHEPHERDS BAY URBAN RENEWAL CONCEPT PROPOSAL – MEADOWBANK

SUMMARY OF PUBLIC AUTHORITY SUBMISSIONS

Sydney Regional Development Advisory Committee (SRDAC) (28 February 2011)

Committee's recommendations and RTAs comments on the subject application

RTA has reviewed the Major Project and **does not support the proposal** in its current form.

SCATS Cabin: Part of Waterview Street was acquired for a SCATS cabin (refer attached plan). RTA has no objection to the development around the SCATS Cabin subject to following conditions:

- any development shall continue to provide direct access to the SCATS Cabin from a public road
- any development should retain the existing amount of parking for maintenance vehicles as well as turning area
- if developer wanted to include SCATS cabin area in the development a replacement area (roughly same geographic area) would need to be found. New site would need to be developed prior to the decommissioning of the current site.
- All costs to duplicate the SCATS Cabin area would be met by developer.

Traffic Modelling:

RTA does not support the statement in traffic report 'development will not have any adverse impacts on the performance of nearby intersections and will not require upgrading or road improvement works.

RTA requires changes to aaSIDRA modelling and electronic copy of modelling to be resubmitted to RTA and Council for review:

- Need clarification that aaSIDRA takes into consideration change in patterns of existing industrial development to residential development
- (review traffic report)

Traffic Data:

RTA requires applicant to obtain current traffic data from the existing industrial uses to determine current traffic generation rate; this can be used as a comparison against RTAs Guide to Traffic Generating Development industrial rate.

Bicycle Paths:

RTA suggests proposed bicycle networks to be extended up to Meadowbank Station to improve access to public transport.

All works associated with proposal shall be at no cost to RTA.

City of Ryde (4 March 2011)

Significant concerns regarding the Concept Plan and Project Application.

Proposed scale and scope is inappropriate for the Meadowbank area. Will result in density that is unmanageable and unsustainable.

Built form will result in inappropriate impacts with respect to traffic, view loss, visual bulk and impact, community facilities and infrastructure.

Proponents have stated within the Environmental Assessment that the Concept Plan is to function as a Master Plan. Insufficient information has been provided to allow for an adequate consideration of the Concept Plan as a master plan. Concept Plan is flawed in the level of information and detail provided.

Impacts arising from the proposed height provided under the Concept Plan which is well above Councils current or intended planning controls. Increased height will result in density and significant impact on traffic, utilities and infrastructure, access network and views to and from the Meadowbank Employment Area.

Proposal failed to adequately give due regard to urban form including building separation, setbacks and achieving high quality of design.

Little or no consideration has been provided regarding the wider Meadowbank Employment Area not affected by Concept Plan. Concept Plan may restrict or prevent the redevelopment of the remaining commercial/industrial and low density residential areas.

Insufficient information in the Concept Plan for adequate consideration of proposal and potential impacts of: building setbacks, open space areas, pedestrian pathways, cycle ways, new road links, land uses, staging of development, social impacts. Additional information should be provided to allow for adequate assessment.

Height:

Increased height unacceptable. Inconsistent with new revised controls and result in poor urban form that lacks human scale, unreasonable and unacceptable impact on views to and from the MEA and provide additional dwellings which will place strain on surrounding access networks.

Buildings will dominate streetscape and proposed public open space areas due to their height and minimal setbacks.

Submitted documentation does not detail whether an articulated top must be provided to all buildings.

Proposed heights along the interfaces between the MEA and surrounding low density residential areas are excessive. Building height will contrast inappropriately with existing single and two storey residences along Constitution Road. Specifically elevations (Hamilton Crescent – East, Hamilton Crescent – West and Bowden Street). Elevations along length of Constitution Road must also be provided.

New public open space areas that act as passage between buildings; some will be located between buildings reaching heights of 8 storeys and in the case of upper level public square and central spine areas 12 storeys. Ramifications for useability of public open space and increased separation of buildings should be considered or a reduction in height.

Views:

Proposal will unreasonably impact on views to and from MEA including views originating from both sides of the Parramatta River (as shown in photomontage). Proposed development will be highly visible and will dominate views of the MEA and surrounding areas.

Size of subject area is substantial and largely under one ownership. May be necessary to require proponent to consider how variation and interest in various buildings designs will be achieved. May include holding design competitions or similar to ensure architectural quality within the precinct.

Concept Plan has failed to provide photo-montages of the other options considered under the EA or under Councils current or potential future controls. This would allow accurate comparison of views from adjoining areas and with the MEA under the Concept Plan.

Topographic study of the MEA (Figure 15 of EA) shows area broken down into two primary areas of valleys and ridges. When overlayed with Figure 37, apparent that two 12 storey buildings will be located at the southern tip of the eastern ridge line. Question whether this height limit is suitable.

Rationale and basis for the heights proposed under Councils Local Planning Study (and that of the current planning controls) is to ensure that future development to the MEA will retain views of the treed ridge line and St Annes Cathedral when viewed from the water. This has not been achieved by the proposed Concept Plan (as evidenced by photomontages).

Existing Development and Current Approvals:

Incorrect (as noted in the EA) that the height of the proposed Concept Plan is in keeping with the existing and approved developments in the MEA.

Many of the heights (shown in Figure 37) are not accurate as they fail to take into account the stepping down of the site of buildings which has resulted in only small portions of the individual buildings achieving the heights identified in Figure 37. Figure 37 does not provide an accurate representation of the existing situation in the MEA and must be corrected.

EA has provided building elevations showing height along the street fronts only. These must be expanded to include average cross sections through the building envelopes and along the public pathways to show the difference in heights between existing development and those permissible under the Concept Plan.

Documentation and Definitions:

Inconsistencies and inaccuracies with the information and definitions in the EA.

Inconsistency in definition of storey in the EA and that of the Ryde LEP 2010 in relation to basement levels and RLs. Proponents method of determining a storey through reliance on the RL of the adjoining roadway is unreliable and questionable practice. The Standard Instrument LEP definition for building height should be used.

Given the definition of building height, the proponents should provide a defined maximum RL for the heights proposed under the Concept Plan. It is appreciated that the use of storeys is easier interpreted, the use of RL to define a maximum height limit will provide a clearly defined development outcome.

Information pertaining to heights appears to be incorrect or needs further clarification including:

- Church Street Elevation does not depict the 8, 16 and 18 storey portions to apply to the 'gateway site'.
- Map 1 – Site Identification and its Context within the Visual Impact Assessment incorrectly identifies the NW portion of MEA as Faraday Park Residential Development. Area is a collection of industrial and commercial areas, with no large scale residential. Currently zoned B4 Mixes use and likely subject to future mixed use development.
- Visual Impact Assessment states that the Concept Plan will allow for a maximum height of 5 storeys along the Constitution Road, Bowden Street and Belmore Street. This is incorrect as proposal will allow for a maximum height of 6 storeys along these areas.
- MEA – Master Plan Consideration states that a number of buildings are very similar in height to existing and less bulky than the old factory buildings. This statement is misleading as a preliminary review of existing building heights against those proposed fails to identify any.
- Statement that 'proposed building forms have been kept low enough to ensure the treed ridgeline is not obscured when viewed from the water' is shown to be incorrect in the photomontages in the Visual Impact Assessment (Views 7, 10-12 and 16).

Building Setbacks and Separation:

Insufficient information provided regarding proposed building setbacks and separation. Need adequate details of the building separation and setbacks and how these areas are to be treated. Should be provided as typical cross section through each street and public open space area. Information is required to allow for an accurate interpretation of the submitted Concept Plan.

The proposed building separation and setbacks are not considered appropriate given the height and scale of development sought under the Concept Plan.

Building Setbacks:

Proposed Building Setbacks detailed in Figure 44 of EA provides setback of 3-5m. Concern that similar setbacks throughout the Concept Plan area and fringe areas regardless of existing low scale development or development to occur on adjoining properties.

Setbacks proposed under Concept Plan are similar to Meadowbank Employment Area DCP 2010 however DCP provides for substantially lower building heights. Building setbacks must be commensurate with building heights (refer Residential Flat Design Code). Proposed setback will not achieve objectives in RFDC).

Can't rely on compliance with Councils DCP regarding setbacks if the heights being proposed are significantly higher than DCP allows. A substantial increase in building setbacks must be provided to respond to the increased height.

Concern about the reduced setback along Hamilton Crescent and the northern side of the western end of Nancarrow Avenue (Figure 33 of EA). No rationale or reasoning provided for the reduced setback, especially given that these areas will front public streets.

Concern regarding setback along Rothesay Avenue which similar to those elsewhere in the development. Given unique nature of the site and its foreshore nature, increased setback should be provided along entire length of Rothesay Avenue. Increased building setback required given the height, bulk and scale of the proposed development and foreshore nature of the area.

Potential for Concept Plan to improve and increase the extent of public open space areas along the foreshore should be explored including complementing and adding to the existing foreshore public open space areas with proponents own holdings.

Building Separation:

No information or minimum setbacks has been provided for building separation in relation to public pathways and open space areas. Unacceptable that setbacks to the open space areas and public pathways will be determined on a case by case basis for each subsequent development application. Reliance on a piecemeal approach to building separation over public open space is considered inappropriate and likely to result in a poor planning and urban design outcomes.

No minimum controls for the width of public open space / pathway areas or separation between buildings fronting these areas has been provided. Concern given that proposed heights will result in public pathways and open space areas extending between buildings of substantial height. May result in a 'canyon' type feel to these areas, discouraging use for prolonged recreation or congregation.

Number of Dwellings:

Questions the need for additional dwellings. Disagrees with EA that Ryde LGA must cater for additional dwellings. Stated that Ryde LGA will be more than capable of satisfying current dwelling targets (Subregional Strategy) without intensification of density in the MEA.

The potential yield rates achieved by complying development under current planning controls estimated by Council is substantially different to those stated in the EA.

No consideration of the social impacts or additional burden on infrastructure resulting from the substantial increase in density and local population has been provided. Increases may influence the need for additional open space or community infrastructure within the immediate area.

Need for Additional Dwellings:

The Market Assessment provides that Ryde LGA must cater for an increase of 15,760 dwellings by 2036. Unknown where this figure has been derived. Metropolitan Plan only identifies a gross figure of 44,000 for entire Inner North area (six LGAs). The draft Inner North Subregional Strategy provided a housing target of 12,00 dwellings for the Ryde LGA.

Councils Local Planning Study identified that LGA has potential to cater for approximately 15,751 dwellings between 2004 and 2036. The proponents claim that the MEA must cater for an increase in dwelling numbers is incorrect.

Dwelling Numbers under Complying Development:

Figure 66 of EA details potential development outcome that may result from current planning controls. Proponents have indicated this would allow for GFA of 225,190m² and 1,500m² public open space. This figure is inaccurate.

Noted that consideration of the yield rates under DCP 2007 (which will be comparable with the yield rates under the Comprehensive LEP) are more appropriate than consideration of current controls.

Potential yields were calculated by Council (dwellings and GFA). Under Council's intended controls a yield of 2089 dwellings and 24,422m² GFA for the entire MEA. Figure excludes existing and approved developments. This is 711 dwellings and 5578m² GFA less than the maximum number in the Concept Plan. Highlighting overdevelopment.

Proponents have failed to take into consideration in calculations: circulation areas, balcony areas, building modulation, minimum building separation or maximum building widths.

EA makes reference to a report by Urban Horizon in relation to traffic generation. Proponents indicated that proposed development will be generally similar to figure provided in that report. However, the Urban Horizon report considered the MEA as a whole, not the limited area covered by the Concept Plan. Comparison with the report figures is inappropriate.

Social Impact of Additional Dwellings:

No assessment of the potential needs of residents from 2400-2800 additional new dwellings has been made. No assessment of the capacity level of existing community facilities has been provided.

Social Impact Assessment must include consideration of (but not limited to): community facilities and their capacity to service the additional dwellings; and requirements and opportunities for active/passive recreation. Noted that was previously requested by Council for the DG Requirements.

Access Network:

Questioned whether the proposed access network is suitable regarding vehicular access, traffic and car parking, pedestrian pathways and cycle way.

EA provides no consideration regarding anticipated generation of movements within the MEA and what impact this will have on the general design and size of cycle ways, roads and pedestrian pathways. This information must be provided.

Vehicular Access:

Noted that the existing road network will generally be maintained by the Concept Plan. Council supports the additional road link between Nancarrow Avenue and Hamilton Crescent.

The proposed road link (connecting Nancarrow Avenue to Belmore Street) fails to provide footpaths along both sides of the roadway or cycle ways, and results in a substantial change in level between the roadway and the adjoining site.

General engineering schematics for the new road do not detail the provision of pedestrian pathways, cycleway, traffic lanes, street parking or tree planting. Information must be provided at this early stage as will heavily influence the positioning of potential building footprints and setbacks to adjoining sites. The buildings of this roadway should be incorporated into the Project Application. Without sufficient information Council cannot determine whether the dedication of land for the road way (as proposed) is acceptable.

The construction of this section of the access network (refer above) within Stages 4 and 10 is of substantial concern, given the difference in staging of the roadway construction and that Stage 1 for the submitted project application will occur immediately adjacent to the new roadway.

Submitted documentation accompanying the PA fails to adequately taking into consideration the potential change of level as part of the construction of the new road link. Specific reference is made to the pedestrian foot bridge that will connect the Project Application building with Hamilton Crescent. Further information must be requested detailing the height of the resultant road in comparison to the Project Application. Recommended that the construction of the road link be incorporated into the Stage 1 Project Application.

Further clarification required in the form of standard cross sections detailing the intended treatments to the vehicular access networks. Not sufficient to state that it will be in accordance with Councils Public Domain Manual. This includes (but not limited to) bicycle pathways, footpaths, tree planting and lighting.

The EA fails to recognise or identify what occurs within the existing Nancarrow Lane (owned by Council). Area is identified by proponents as public pedestrian access, this portion of land is under Council ownership and no details have been provided as to what works will occur over this area. This is of substantial concern and must be clarified.

Consideration must be given to the ability of the existing road network and proposed new connection to be able to cater for the placement of rubbish bins along pedestrian sidewalks and the manoeuvring of garbage trucks. Provision of standard cross sections addressing the above must be provided by the proponents.

Traffic and Carparking:

Deficiencies in TMAP relating to validity of assumptions, extent of matters considered, information provided and methods undertaken.

TAR Technologies undertaken an independent review of TMAP on behalf of Council (refer summary of issues raised below):

- TMAP not been prepared in accordance with RTA Guidelines. This has been confirmed by the RTA.
- Consideration must be given to potential of future development within or surrounding the MEA precinct boundary and the current Part 3A project (Achieve Australian Concept Plan) and included in the TMAP.
- TMAP failed to detail all assumptions and calculations, these must be recorded and tabulated in accordance with RTA guidelines.
- TMAP has not been accompanied by modelling data used to determine the impacts of traffic flow. This must be provided to Council in an electronic format to allow for checking of traffic flow patterns through and around the development area. These must include both paramics, SIDRA and Trip Tables from the Transport Data Centre.
- Noted that a SIDRA model is not appropriate for the scale of the development proposed.
- Proponent should develop a Location Specific Sustainable Travel Plan to ensure a high use of public transport, walking and cycling is achieved and increased over time. This Plan should consider: the establishment of a Precinct Wide Body Corporate which underpins the values of the LSSTP for the precinct and is responsible for the governance of the plan; and use of an incentive schemes including a yearly rebate on their body corporate rates or other for purchasing a full year public transport travel pass or alternatives.
- TMAP failed to give consideration to: existing travel patterns (including freight);
- TMAP failed to consider future travel patterns (including freight). Assumption that future traffic flows after the introduction of residential development would be in reverse is not supported by the analysis, research or traffic surveys. It is not a solid basis on which to undertake any detailed network modelling and derive future intersection impacts. Method of analysis has not been discussed without any supporting information on trip distribution throughout the site or at intersections, eg, the selection of comparable sites for forecasting trip generation rates.
- TMAP failed to give discussion on mode split targets (desired outcomes in transport and travel terms) agreed by the TMAP Project Control Group.
- TMAP failed to include Regional VKT estimates; discussion on site CO2 generation levels; proposed staging and key milestone in the staging (from a trip generation/ travel

demand perspective); information on the demographics of the site (household sizes, car ownership, life cycle stage)

- TMAP did not consider: identification of issues to be considered in the transport assessment; assessment of effects of possible increased demand on transport services; discussion of parking distribution and adequacy; estimation of the transport modes by which person or freight will choose or be required to use between origins and destination; options testing in transport modelling.
- TMAP also needs to consider sensitivity testing for following: proposed land uses, densities and staging; demographic changes including household size and socio-economic group, car ownership and use levels; trip generation rates for various land uses; trip purposes and selected modes; forecast years, regional development and population changes; variations in travel costs.
- TMAP needs to include details of TMAP evaluation and modelling.

Pedestrian Pathways:

Insufficient information has been provided regarding the pedestrian pathways. No information on the scope, size, design or nature of the proposed pathways. Typical cross sections detailing the pathways must be provided; this includes pathways in open space areas.

Proposed pedestrian pathways (Figure 48) concentrate pedestrian movements to key focal points over Nancarrow Avenue, Bowden Street, Belmore Street and Constitution Road. Pedestrian pathways are proposed as discrete crossings rather than being diffused across wider areas. No consideration as to whether this will be achieved via signalised crossing or other alternative methods.

No information on how shared surfaces (portions of Nancarrow Avenue and Rothesay Avenue) will be achieved, treatment of these areas or whether avenues are suitable for shared surfaces due to level of traffic and speed limits.

Inadequate details how the pedestrian pathway will connect into the wider area and whether existing pedestrian pathways outside the Concept Plan areas are capable of coping with additional burdens. Consideration must be given to whether existing pedestrian pathway areas must be upgraded in response to increased densities.

New connection between Nancarrow Avenue and Hamilton Crescent must have a pedestrian pathway on both sides of the street.

Documentation does not accurately identify pedestrian pathway areas eg pedestrian access network shown within Figure 48 of EA identifies pedestrian routes that run through private property not included within the Concept Plan area (specifically 146 Bowden Street, 2-4 Porter Street, 125-135 Church Street).

Many of the public pathways to be provided as public open space are not fully accessible due to stairways. This is unacceptable.

Cycleways:

Insufficient information provided re cycleways. No detail on extent of cycleway of works required to the roadways to cater for these new cycleways. Concern given that existing roads have potential for substantial through traffic.

Use of pedestrian pathways to cater for cycle ways should not be supported as this contravenes current road rules.

Landscape Plan which details a section of Nancarrow Road fails to detail how a cycleway is to be provided. Plan identifies that portions of Nancarrow Avenue and Rothesay Avenue are shared surfaces. Insufficient information provided to determine if this is acceptable or appropriate. Information must be provided which includes estimated levels of traffic through these areas and sections showing how the areas are to be treated.

Cross section must be provided to determine whether these shared areas are of appropriate size, scope and grade. Given likely speed limits and anticipated volumes of traffic, shared areas may not be practical. Likely that internally generated traffic alone will exceed the minimum thresholds provided by the RTA.

Submitted Pedestrian and Cycle Access Plan has failed to identify how the proposed cycleways will connect into the wider cycle way network. This must be addressed.

Key locations for bicycle storage facilities have not been identified and no further information provided. Details cannot be left to future interpretation as use of cycle ways is fundamental to the proposal and its intensification of the MEA.

Open Space:

Insufficient information has been provided detailing the areas of public and communal open space and their design, nature and accessibility.

EA fails to detail the total extent of public or communal open space. No details of how and where the gross figure of 4,125m² public open space. EA and Landscape Plan has not adequately detailed which area are to be communal open space associated with individual residential buildings and which are to be public pathways /open space areas.

Concern re areas identified as 'riparian entry park' and the 'riparian foreshore link'. Figure 49 provides that a pedestrian and bicycle pathway located within the area but no information provides as to what areas are communal open space and which are public.

Noted that part of the riparian foreshore link is located over a property not under the ownership of the proponent. Concern given note in EA that 'building envelopes and open space areas located over sites not owned by the proponent are indicative only and do not form part of the Concept Plan'.

Seek clarification whether the 4125m² additional community open space includes the above sites (not owned by proponents). Also that areas that are currently under public ownership are not to be included in the calculation as these area are existing public areas.

Break down of areas to be provided as open space and communal open space needs to be provided.

Open space areas which are to be utilised by the public must have the size, design and treatment adequately detailed.

Communal Open Space:

No detailed consideration of the size of communal open spaces in relation to the anticipated number of residents to be utilising the areas.

RFDC provides a minimum 25-30% of sites should be provided as communal open space. RFDC makes specific mention that brownfield sites may be capable of more than 30%. The proposal should allow for more than 30% of site as communal open space.

Only new substantial open space area to be provided along the foreshore is the semicircular plaza. The proponents must explore possibility of expanding the open space provisions within their own holdings along the entire length of the foreshore. The proposed central foreshore plaza area is considered insignificant when considered in comparison to the large uplift.

The sufficiency of the proposed amounts to public open space to cater to the proposed density has not been addressed with certainty.

Noted that Ryde's large amount of open space (3.5 hectares per 1000 people) includes some 50% which is inaccessible natural area and that the area available that might be described as passive open space is 0.51ha per 1000 residents.

Landscape Plan provides little information to treatment of open space areas including design and detailing, finishes, lighting and intended use.

No details of lighting and impacts of lighting of open space areas and surrounding areas. Concern considering the minimal width of public pathways and number of pathways located around the perimeter.

Not satisfactorily demonstrated that proposed open space areas will be public thoroughfares rather than places designed for recreation and congregation. Attempt to ensure that public open space areas are interesting and engaging must be made.

Require development of a set of base criteria and principles to be following in the design and construction of the public open space areas. Principles provided in the Landscape Plan are considered unsatisfactory as they do not provide sufficient detail or criteria for design of future areas.

Treatment of all public domain areas should be in accordance with Council's Public Domain Manual. Landscape Plan associated with the Concept Plan should reflect this.

Accessibility of Open Space:

Landscape Plan (Figure 48) identified public open space pathway areas fail to provide continuous paths of travel: pedestrian spine north, pedestrian spine south, upper level public square (north-south travel), central spine, central shore plaza, upper eastern pedestrian link, stage one landscape master plan (western public pathway). These areas are public pathways, failure to provide continuous travel path is therefore unacceptable (refer Disability Discrimination Act 1992 and Australian Standards).

Accessibility Master Plan Report must explore in further depth the possibility for alternative paths of travel that will not unduly burden individuals.

Accessibility Masterplan Report primarily focuses on how fully accessible access will be achieved to future buildings rather than how equitable access will be achieved throughout the Concept Plan area as a whole.

Land Uses:

Proposal highlights that the MEA is well served by existing commercial/retail areas and only small-scale commercial, retail and community uses in certain location should be provided. The EA does not detail where these locations are or the proposed community facilities to be provided. This information must be provided.

EA states that minimum setback of 25m will be provided to residential buildings along Church

Street. The 5 storey of the 'Gateway Site' will fail to comply with this 25m setback requirement. Assumed that this area is commercial/retail uses but this must be clarified.

SREP (Sydney Harbour Catchment) 2005:

EA did not give consideration to the Sydney Harbour Foreshores and Waterways Area DCP 2005.

Wider Meadowbank Employment Area:

EA fails to consider the potential impact the development of the Concept Area may have on the integrity and planning outcomes of the MEA as a whole. Concern that large portion of entire MEA area remains undeveloped and the impact that the Concept Plan will have on this area achieving its potential. Overdevelopment of central portion of the MEA has the potential to stifle future development of the remaining sites.

Combined impact of the Part 3A and future development applications in the area must be considered.

Consultation:

Substantial concerns regarding the extent of consultation undertaken as part of the proposal with the community and Council.

Concern about reference to Ryde Council's support of the proposed development. At each meeting held between the proponents and Council staff, staff raised several concerns regarding the extent of the proposed development and its excessive nature.

Council must make it abundantly clear that at no point did staff indicate support for the proposal. Staff has attempted to assist the proponents in preparing a Concept Plan that provides for an appropriate level of development on the subject sites, however from the information submitted, this has not been achieved.

Noted that the community consultation process was to have been guided and informed by the Consultation Strategy that forms part of the EA. Following points noted:

- Start of public exhibition (26 Jan) was a public holiday and Council's Civic Centre closed
- Advertisements placed in local newspapers did not give enough notice of consultation sessions and were after the commencement of exhibition
- Model provided on 8 February well after exhibition commenced. Model does not accurately detail terrain of Concept Plan area or surrounds.

Voluntary Planning Agreement:

Limited discussions have been held with Council regarding any future VPA. One meeting has been held that discussed at a high level potential matters to be considered in a VPA.

Flooding:

Generally proposed flood management methods are in accordance with Council's requirements. Submitted documentation included outputs from TUFLOW Models, which includes an increase in overland flow post works. Models used to produce these outputs should be independently verified before acceptance of these output rates. Models need to be provided to Council for verification.

Master Plan and Staging of Development:

Concern about the level of detail in the Concept Plan. Should proponents be seeking the approval of a new suite of planning controls for the site, the Concept Plan should contain the

same level of documentation that a DCP or master plan in order for future DAs to be adequately assessed. Substantial areas of concern with respect to the level of detail provided.

Applicant must provide additional information and amend Concept Plan substantially so as to ensure that the documentation contains all necessary information to allow informed consideration.

Substantial concerns regarding proposed staging of the development. Specific reference made to construction of the new road as part of Stages 4 and 10 rather than jointly under the one stage. Construction of the new road is vital to the proposed application and should be included within Stage 1.

Detailed staging for the development of the Concept Plan is needed as the delivery of buildings, infrastructure, community benefit will be vital to the consideration of the VPA.

ESD Guidelines and Report:

Concern about Base Targets and Stretch Targets being met given standard construction methods and unlikelihood of large scale retro fitting of strata owned residential apartment buildings. Strongly recommended that the Stretch Targets be incorporated into the Base Targets or new achievable Base Targets be provided.

Many of Base Targets and Stretch Targets are unachievable and should be reconsidered/replaced with more appropriate targets.

- Indoor Environmental Quality (IEQ) provides a maximum internal noise level for habitable rooms excluding bedrooms of 40dBLAeq which is unlikely to be achievable.
- ESD Guidelines should avoid use of ambiguous terms such as 'ideally' and should provide clear goals and targets.
- Renewable Energy and Peak Electricity Demand Reduction – Stretch Target of non-electric primary energy source to be used for heating systems is unlikely to be achieved. Must be clarified as to whether energy sources are to be sustainable and how this could potentially be achieved.
- Thermal Comfort – the Stretch Target of ceiling fans for 95% of apartments is unlikely to occur due to current standards for floor to ceiling heights and current interior design trends.
- Daylight – the Stretch Targets provided for are unlikely to be achievable by future development due to proposed heights and orientation of anticipated built forms.
- Unoccupied Areas – the Stretch Targets for unoccupied areas are unlikely to be implemented due to extent of retrofitting required for these targets.

Utilities:

Submitted Utility Services Report contains minimal information with respect to the concept areas ability to cater for the proposed dwelling numbers.

- Electricity – Utility Services Report states that the full extent of necessary updates and distribution systems augmentation will be investigated by conducting feasibility and options study. This must be undertaken prior to any determination of the application.
- Consideration must be given to the placement and location of substations within the MEA as it is possible that the location and placement of substations may interfere with the proposed setbacks, building locations and access networks.
- Telecommunications Infrastructure: No supporting documentation or data supporting the statement that 'excellent telecommunication services can be provided due to the proximity of the Ryde Telephone exchange'. More detailed consideration of this must be provided.
- Water and Sewerage Services: Concerned with the feasibility letter from Sydney Water (18 Aug 2010) given letter does not detail what has been provided to Sydney Water and the proponent has indicated to Council that the design of the Concept Plan has been undergoing constant review.
- Gas Services: No substantial details provided of gas services within the area. No information regarding potential consultation undertaken with gas services provider or the types of amplification and extension work that may need to be carried out within the Concept Plan area.
- Shell Crude Oil Pipeline: Utility Services Report and all other documentation do not include consideration of the Shell Crude Oil Pipeline that extends along the foreshore area. Whilst it is possible that potential impacts upon the Shell Crude Oil Pipeline could be considered against each project application to be lodged at a later date, this is not appropriate as the location of the Pipeline may prevent construction of buildings in accordance with the Concept Plan.
- Waste Management: no documentation has been provided in the EA that demonstrates consideration how additional waste resulting from the proposed development will be managed. This is of substantial concern given that the Concept Plan represents a substantial increase in density and will result in change to existing access network which may impact waste collection services.
- A waste management plan detailing waste reduction strategies, resource recovery and waste collection methods for future development must be provided. Consideration must also be given to how and where waste bins will be collected and impact on pedestrian pathway. Waste management plan must demonstrate compliance with Councils Strategic Waste Action Plan.
- Documentation Errors: Utility Services Report is inconsistent with the EA as it identifies an estimated 2500-2600 dwellings rather than 2400-2800.

Master Plans for Utilities: Questionable whether the proponents will be able to provide adequate utilities or services to the area. Proponents must provide a Master Plan for the roll out of utilities which includes staging, timing and targets. This document will need constant review.

TAR Technologies – to City of Ryde Council (26 February 2011)

TMAP:

Provided review of TMAP.

TMAP does not identify the strategic context of the project and setting objective and performance measure.

Plan should include targets for reducing private car use.

Lack of consideration for transport options to access rail and bus (high people movers) – development focuses mainly on pedestrian and cyclists.

Further details were required on the traffic and transport aspects of the assessment.

NSW Transport (4 March 2011)

Public Transport:

Review of the Concept Plan, Stage 1 Project Application and appended advice by Varga Traffic Planning. Level of public transport analysis supporting the concept plan approval requires further detailed consideration prior to further reconsideration of project applications.

Further detailed transport review of proposed renewal area should take into consideration the cumulative impacts on surrounding public transport networks including detailed transport modelling.

TMAP is not consistent with the draft Interim TMAP Guidelines. Further detailed traffic and transport analysis to support the proposed renewal area should be consistent with these Guidelines.

Given proximity of the site to high frequency bus corridors, Meadowbank Station and Meadowbank Ferry Wharf, TNSW recommends conditioning the application based on lower parking rate levels (not Councils) in line with RTA Guide to Traffic Generating Development.

Car Share Opportunities:

Use of car share opportunities should also be conditioned.

Bicycle Parking:

Support for increased provision of bicycle parking and end of trip facilities to support sustainable transport choices.

Cycling facilities should be provided in accordance with the rates and design specifications outlined in NSW Planning Guidelines for Walking and Cycling.

Bicycle Network:

TNSW supports separate RTA advice regarding extension of proposed bicycle network towards Meadowbank Station.

Pedestrian and Cycle Strategy:

Detailed pedestrian and cycle strategy should be prepared for the proposed renewal area and should have regard to the NSW Bike Plan.

Transport Information:

TNSW request the preparation of a Travel Access Guide (TAG) and Workplace Travel Plan (WTP) be a condition of consent for both the concept plan and project applications. Examples including bulk purchase of public transport tickets at discount rate, bike rental programs for employees, pay-back schemes for residential/ employees not using parking, awareness raising of local public transport, walking and cycling options.

Department of Environment and Climate Change (25 February 2011)**Biodiversity:**

Vulnerable species *Eucalyptus nicholii* occurs on the site but an assessment of significance under Section 5A of the Act was not undertaken. An assessment should be undertaken in accordance with the Threatened Species Assessment Guidelines 2007.

Site has potential to contain roosting habitat for microhiropferan bats (vacant or underutilised buildings) and site is proximate to some favoured microbat foraging habitats such as mangroves. Recommend that survey and assessment to undertaken to assess the presence and significance of the site for this group of threatened fauna.

Floodplain Risk Management Aspects:

Flood Assessment report concludes that the inclusion of proposed drainage augmentation works associated with Stage 1 development are able to reduce the extent of flood inundation and will greatly reduce the extent of high hazard flooding in comparison with existing conditions. Noted that additional inlet pits are proposed, the overall drainage system including the vital overland flow path system should be designed to mitigate any potential adverse impact from blockage to culverts, pits and pipelines from any debris build up.

Draft Integrated Water Management Plan states that the lower level basement car park level is below the 1:100 year flood level. Pedestrian egress route from the car parking area should be appropriately signposted and effectively reach a safe location above the Probable Maximum Flood (PMF) level. Basement car park should be designed to ensure that flooding within the car park is controlled and gradual with adequate opportunity to self evacuate via the sign posted route.

Given short warning times associated with Shepherds Bay catchment flooding, consideration may need to be given to 'sheltering-in-place' in dwellings in any vulnerable locations as an appropriate self evacuation strategy. Need to ensure that there are development controls in place to ensure that affected dwellings can safely withstand flooding above the 100 year flood planning level up to the PMF level.

Sydney Water (24 February 2011)**Water:**

Current water system does not have sufficient capacity to service the proposed development. Drinking water mains fronting the proposed development do not comply with the minimum size required by the Water Supply Code of Australia to serve the development capacity.

Amplification works need to be completed by developer to service the site. Size description and diagrams provided.

Wastewater:

Current wastewater system does not have sufficient capacity to serve the proposed development. Amplification works need to be completed by developer to service the site. Size description and diagrams provided.

Trade Waste:

In event that trade wastewater is generated, property owner is required to submit an application for permission to discharge trade wastewater to the sewerage system before business activities commence. Information provided about removal of 'industrial' waste'.

Sydney Water Servicing:

Noted requirement for Section 73 Certificate.

NSW Maritime (16 February 2011)

No concerns.

Office of Water (11 March 2011)**Protection and Enhancement of Riparian Land Along Parramatta River:**

The Environmental Assessment does not adequately address the protection and enhancement of riparian land along the Parramatta River at the project site.

Figure 1 in Annexure 18 shows further encroachment into the riparian/aquatic environment is proposed by a foreshore boardwalk. Locating the boardwalk in riparian land (even though it does not remove existing vegetation) further reduces the opportunity to improve riparian outcomes along the river as the pathway would prevent the rehabilitation of riparian vegetation.

Questions the need for a boardwalk when there is already an existing pathway that is located in the riparian area. The riparian area should be protected and rehabilitated with native plant species endemic to the vegetation community.

Noted that 'Planning Guidelines for Walking and Cycling' includes environmental design principles for paths along creeks and the first principle is 'to identify and protect with zoning continuous riparian zones of a minimum width 40m'.

The design intent for the Riparian Entry Park and the Riparian Foreshore Link (Volume 6 – Annexure 13) shows a 'riparian waterbody' but the waterbodies are not connected to each other and do not form a naturalised creek system. The plans also locate pedestrian pathways, open lawn areas and children's play areas within and along the 'riparian areas' which is not consistent with the second principle 'natural creek-like water features and planting'.

Groundwater:

Inconsistency with Section 7.1.1 of Annexure 19 and Section 55 of EA – location and depth of features such as basement car parking.

If proposal likely to intercept or use groundwater a Licence under Part 5 of the Water Act 1912 is required. All proposed groundwater works including bores for the purpose of investigation, extraction, dewatering, testing or monitoring must be identified and approval obtained prior to

their installation. Recommended conditions of approval attached to submission.

A proposal that requires permanent or semi-permanent pumping/extraction of groundwater to protect the buildings will not be allowed. The proposal must ensure it will not require this style of facility or activity.

Section 7.6.2 of Annexure 19 notes that where high groundwater flows may be anticipated or where dewatering is undesirable tanking may be used. The construction of any structure that may be impacted by groundwater, will require a water proof retention system (ie a fully tanked structure) with an adequate provision of future fluctuations of the watertable level.

The specific regional groundwater monitoring program to provide information on depth of groundwater and direction of flow is supported.

Example provided of NSW Office of Water Recommended Conditions of Approval