

PRELODGE MENT PANEL ADVICE EIS CONSULTATION AND ADVICE

PROPERTY: 6-8 Julius Avenue, North Ryde

MEETING DATE: Monday, 5 May 2025 **TIME:** 2pm to 3pm

PRELODGE MENT No: PRL 2024/0013

DEVELOPMENT: Proposed construction and operation of a new Data Centre that includes tree removal, earthworks and landscaping, carparking and associated infrastructure. The Application is prepared as a State Significant Development Application (SSDA)

ATTENDANCE:

Council:

Nicholas Najar	Acting Senior Co-Ordinator Development Advisory Service
Michael Cuthbert	Infrastructure Strategy & Planning Coordinator
Daniel Pearce	Senior Coordinator Engineering & Landscaping Services
Gasan Mohamad	Senior Coordinator Activation & Compliance
Amir Mousavi	Senior Coordinator Transport Development Services
Robert Platt	Development Contributions Coordinator
Leila Faghihi	Senior Engineer Stormwater & Floodplain Management
Justin Byrne	Senior Civil Engineer Activation & Compliance
Paula Martin	Development Advisory Officer - Town Planner
Jeremy Giacomini	City Architect
Mark Taylor	Senior Coordinator Park Planning

Proponents:

Asher Richardson	Willowtree Planning
Andrew Cowan	Willowtree Planning
Nathan Smith	Logic Projects
Dan D'Ambroisa	Logic Projects
Alex Hancock	ISPT
Matthew Cox	ISPT
Andrew Owens	Greenbox Architecture
Andrew Monteath	TTW
Andrew Morse	PTC
Luna Tran	Arcadia

NOTES FOR PROPONENTS

The Application is proposed under the State Significant Development Pathway with the Department of Planning Housing and Infrastructure being the consent authority. This advice serves as a record of Council's consultation and detailed advice provided to the Proponent to assist them prepare their Environmental Impact Statement (EIS).

This advice contains technical advice that is recommended to be considered and addressed in any EIS submission. The Pre-EIS advice does NOT constitute a formal assessment of your proposal and at the time of EIS Lodgement Council will undertake a detailed review of the complete application. A complete application should address this advice and respond to the issues raised.

Introduction

On 7 February 2025, Willowtree Planning Pty Ltd on behalf of (the Proponent) ISPT Pty Ltd (ISPT) submitted a Secretary's Environmental Assessment Requirements (SEAR) request letter to the Department to request industry-specific SEARs, under the Rapid Assessment Framework (RAF) to accompany a future State Significant Development Application (SSDA) proposal at 6-8 Julius Avenue, North Ryde.

A SEARs has been issued for a proposed data centre development known as *SSD-80018208*.

In accordance with *Section 25 of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021*, the proposal is classified as a State Significant Development (SSD) as it comprises a data centre with power consumption exceeding 15 megawatts.

Having received the SEARs for the proposed data centre development, the Proponent (ISPT) sought preliminary discussions with Council to inform the Environmental Impact Statement (EIS) that is currently being prepared.

The Minister for Planning (or its delegate) is the Consent Authority for the SSDA application. However, City of Ryde Council (Council) as the local government authority for the Site to which the application relates is identified as a key stakeholder and detailed consultation with Council is therefore required by the SEARs.

Willowtree Planning (on behalf of ISPT) has engaged Council in a formal Pre-EIS review of their proposal for detailed feedback. To support the Pre-EIS review, the Proponent provided Council with a draft package dated 17 April 2025 including:

- **Appendix 1** General Consultation Meeting Minutes
- **Appendix 2** Architectural Plans
- **Appendix 3** Landscape Plans
- **Appendix 4** Macquarie Park Design Guide Compliance Table
- **Appendix 5** Draft Letter of Offer
- **Appendix 6** Civil Plans
- **Appendix 7** Traffic Impact Assessment
- **Appendix 8** Swept Paths Analysis
- **Appendix 9** Survey Plan
- **Appendix 10** Existing Integrated Services Overlay
- **Appendix 11** Sydney Water Advice
- **Appendix 12** Ausgrid Advice
- **Appendix 13** Electrical Site Plan
- **Appendix 14** Concept Communications Plan

Council's detailed advice to inform the EIS is provided below.

THE SITE

The Site is located at 6-8 Julius Avenue, North Ryde and legally described as Lot 89 DP1082131. The Site is irregular in shape and is located on the south-eastern side of Julius Avenue. The Site has an area of approximately 2.863ha, a primary road frontage of approximately 100m to Julius Avenue and a partial rear frontage to Richardson Place (cul-de-sac) at the north-eastern corner of the Site. (Refer *Figure 1*). The Site is currently vacant except for some regrowth vegetation.

Note: In 2009, the north-western part of the Site was excavated and cleared of vegetation as part of a previously approved Modified Determination No. 1395/1999. The Site is subject to flooding, slope instability and is bushfire prone.



Figure 1: Locality and Context Plan markup (Source: Ryde Maps)



Figure 2: Site Plan (Source: Greenbox Architecture Pty Ltd)

THE PROPOSAL

The proposal involves the construction and operation of a new data centre on the Site (to be known as the Julius Avenue Data Centre) that involves the following:

- Site preparation works;
- Earthworks and additional site retaining;
- Infrastructure comprising civil works and utilities servicing;
- Construction of a data centre comprising:
 - Basement car parking for 53 cars, including 2 accessible;
 - 12 data halls across seven (7) storeys with an IT load of 115.2 MW and a maximum power consumption of 169 MW, with upper-level mechanical equipment and rooftop plant;
 - Five (5) storey office/front of house building;
 - Six (6) storey enclosed generator gantry to rear of data centre.
 - New Ausgrid precinct-wide 132 kilovolt (KV) Subtransmission Switching Station (STSS);
 - One (1) new public street along the southern part of the Site;
 - Two (2) new pedestrian through-site links; and
 - Removal of approximately 509 trees (with complementary landscaping and offset planting)

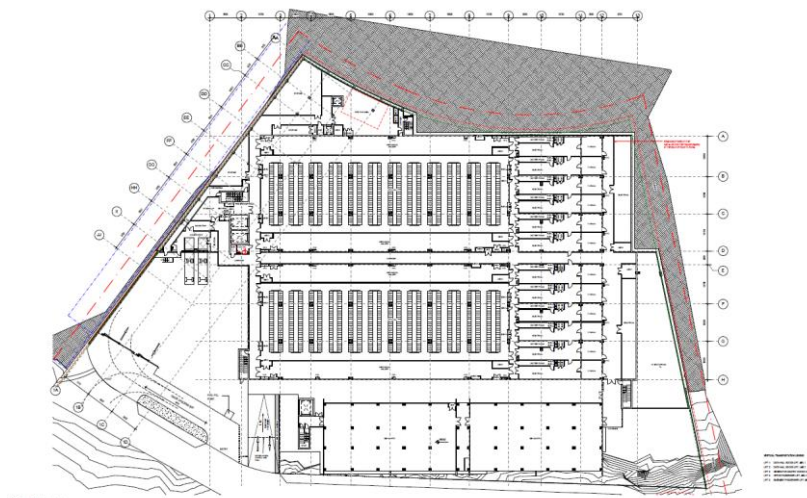


Figure 3. Ground floor Plan extract (Source: Greenbox Architecture)

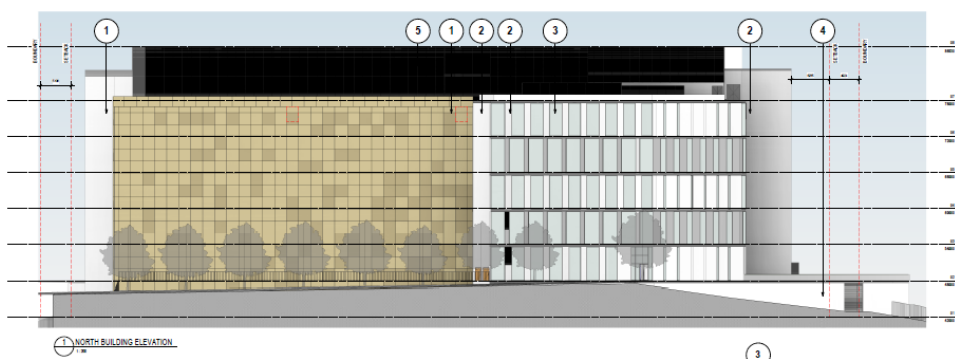


Figure 4. Proposed North Building Elevation facing Julius Avenue (Source: Greenbox Architecture)

APPLICABLE STATUTORY PLANNING CONTROLS & POLICIES

Statutory Planning Controls

The following planning & building controls are identified as applicable to the development:

- *Protection of the Environment Operations Act 1997*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *Rural Fires Act 1997*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *Ryde Local Environmental Plan 2014*
- *Macquarie Park Design Guidelines*
- *Ryde Development Control Plan 2014*

Applicable Environmental Planning Instruments

Protection of the Environment Operations Act 1997

From the information provided with the Pre-EIS review, it is unclear as to whether or not the proposal will trigger the requirements of the POEO Act. The EIS should demonstrate if it triggers the requirements as it relates to chemical storage as the development may need to obtain a licence for a scheduled activity.

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) applies to the development. Any development application submitted must demonstrate consistency with its aims and objectives. The development will be considered under *Division 4.7 State Significant Development of the EPA Act* and DPHI will be the consent authority.

Environmental Planning and Assessment Regulations 2021

The *Environmental Planning and Assessment Regulations 2021* (EPAR 2021) applies to the development. The submitted development application is required to be consistent with its requirements, under *Part 3 Development applications* and other relevant sections of the *EPAR 2021*.

Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

It's understood that the proposal involves removal and disturbance of significant vegetation and may cause significant impact to native fauna habitat. In that regard Council requires a Biodiversity Development Assessment Report (BDAR) to be provided with the application. It is recommended that a vegetation management plan, be included in the application that demonstrates how vegetation management will occur for the life cycle of the development.

Rural Fires Act 1997

The Site is identified as bush fire prone land, with Vegetation Category 1 affecting the south-eastern half of the Site and Vegetation Buffer affecting the north-western half of the Site.

Any detailed application should be supported by a bushfire hazard assessment. It's understood that the EIS would be referred to the RFS for comment.

State Environmental Planning Policy (Planning Systems) 2021

The development is proscribed as being SSD under *Clause 25 of Schedule 1 of the Planning System SEPP*. DPHI will be the consent authority.

State Environmental Planning Policy (Resilience and Hazards) 2021***Chapter 3 Hazardous and offensive development***

The requirements of Chapter 3 of the SEPP will apply to the proposal, given the proposal includes storage of large quantities of fuel and other materials.

A detailed hazards and risk assessment is to be provided with the application that addresses the SEARS requirements and considers the risks and hazards from a cumulative perspective. The EIS should demonstrate appropriate mitigation measures needed to address this matter.

Chapter 4 Remediation of land

The requirements of Chapter 4 of the Resilience and Hazard SEPP will apply to the site. In accordance with *4.6 Contamination and remediation to be considered in determining development application* of the Resilience and Hazard SEPP. It's understood that a Contamination assessment will be provided with the EIS as required by the SEARS.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The EIS should address the relevant clauses under this Environmental Planning Instrument (EPI). Council's detailed Traffic advice is contained in the Comments section below.

State Environmental Planning Policy (Sustainable Buildings) 2022

The development will trigger the requirements of the Sustainable Buildings SEPP. The EIS should demonstrate compliance with Chapter 3 of the SEPP. A detailed ESD report is to be provided with the application. Council particularly emphasises demonstrating that:

- Water consumption is reduced.
- Reduce energy and electricity use where possible and use renewable energies.
- Minimise waste from construction and consider circular economy principles to reduce carbon footprint.

State Environmental Planning Policy (Biodiversity and Conservation) 2021***Chapter 2 Vegetation in non-rural areas & Chapter 6 Bushland in urban areas***

The proposal involves the removal of numerous trees on the site. The EIS will need to demonstrate that trees removed as a consequence of any Development Application approval must be replaced in accordance with *Section 6 of the Urban Forest Technical Manual* (to effectively maintain the Urban Forest canopy).

Council's detailed advice related to Trees, Landscaping and biodiversity is contained in the Comments section below.

Zoning and Permissibility

Under *RLEP 2014 Part 2*, the site is zoned *E3 Productivity Support*. In the *E3* zone, light industries are permitted with development consent. As a data centre is a form of light industry (*high technology industry*), it is nominated as being permissible with consent in the zone.

Height of Building

A maximum building height of approximately 48m is proposed.

Under *RLEP 2014 Clause 4.3*, the site is mapped as being subject to a maximum building height of 30m. However, the SSDA intends to utilise bonus incentive height provisions pursuant to Clause 7.7 of the RLEP2014. Council's response is detailed under Contributions and Public Benefit advice contained in the Comments section below.

Floor Space Ratio

Under *RLEP 2014 Clause 4.4* the site is subject to a maximum floor space ratio (FSR) of 1.1. A maximum FSR of 0.92:1 is proposed (26,185sqm). The Developments FSR complies with the base FSR.

Stormwater Management

RLEP 2014 Clause 6.4 applies to the development. Council's detailed Stormwater Management advice is contained in the Comments section below.

6.6 Environmental sustainability

RLEP 2014 Clause 6.6 applies to the development as it includes development with greater than 1500m² in an employment zone. The EIS should demonstrate that the clauses requirements are incorporated into the project.

Ground Floor Development in land zoned E3

RLEP 2014 Clause 6.7 applies to the development. *Clause 6.7* requires that ground floor development within the *E3* zone be used for business or employment activities. The clause states:

6.7 Ground floor development on land in Zone E3

(1) The objective of this clause is to restrict certain development at the street level for buildings in Zone E3 Productivity Support.

(2) Development consent must not be granted for development on the ground floor of a building within Zone E3 Productivity Support if the development would result in any part of the ground floor not being used for business or employment activities, other than any part of that floor used for the purposes of—

(a) lobbies for any commercial, residential, serviced apartment or hotel component of the development, or

(b) access for fire services, or

(c) vehicular access.

(3) In this clause, commercial activities, in relation to the use of a building, means using the building for the purposes of business premises, community facilities, hotel or motel accommodation, landscape and garden supplies, light industries, passenger transport facilities, timber and building supplies or warehouse or distribution centres.

The EIS will need to demonstrate that the ground floor is used for business or employment activities as described in the clause. The applicant is advised that under this clause parking cannot be located on the ground floor as it would breach this requirement.

Macquarie Park Transport Oriented Development Precinct (and Macquarie Park Design Guide)

RLEP 2014 Part 7 applies to the development. The proponent states that the intention is to design the proposal to be consistent with the provisions of *RLEP 2014* including the *Macquarie Park Design Guide*.

Macquarie Park Design Guide

RLEP 2014 Clause 7.3 prescribes that development consent must not be granted to development on the Site unless the consent authority is satisfied the development is consistent with the *Macquarie Park Design Guide* (the *Design Guide*) and including the relevant objectives and outcomes. Council advice below contains discussion on relevant compliance matters within the design guide.

Requirements for increased building heights and FSR.

RLEP 2014 Clause 7.7 (Additional requirements for increased building height and floor space ratios on land other than Key Sites) permits development in accordance with the incentive provisions if the consent authority is satisfied that there will be adequate provision of recreation and access network infrastructure.

The SSDA intends to utilise the incentive height provisions (but not the incentive FSR provisions of *RLEP*). To utilise these incentives the applicant will need to engage Council with a Voluntary Planning Agreement (VPA). Councils detailed VPA (Offer)/ Development Contributions advice as related to *RLEP 2014 Part 7* is contained in the Comments section below.

It's noted that the application includes a variation to the incentive HOB therefore warrants the submission of a Clause 4.6 request. The Clause 4.6 will need to demonstrate that compliance is unnecessary and that there are sufficient environmental planning grounds to justify any exceedance.

Ryde Development Control Plan 2014

The site is located within the Macquarie Park Precinct, as such the controls of *Section 4.5 Macquarie Park Corridor of the Ryde Development Control Plan 2014* would apply. Key controls include:

- *4.0 Access network*
- *5.0 Public domain*
- *6.0 Implementation – infrastructure, facilities and public domain improvements*
- *7.0 Built form*
- *8.0 Site planning and staging*
- *9.0 Environmental performance*

The EIS should demonstrate consistency with the RDCP requirements.

Note: It is acknowledged that the *Design Guide* prevails to the extent of any inconsistency between the *Design Guide* and the DCP. *Section 2.10 of the Planning Systems SEPP* prescribes that DCPs do not apply to state significant development. The Proponent has indicated they will still seek compliance with the DCP has been sought, and any non-compliances will be appropriately addressed as part of the SSDA submission.

Comments/issues raised by Council's Pre-lodgement Panel

A General Consultation meeting was held with Council on 13 March 2025 and Council preliminary comments provided.

Following the latest Pre-EIS meeting (5 May) and review of the proposal, this advice provides additional comments and issues that the proponent needs to address prior to the lodgement of any application. Given the preliminary nature of the details provided, it should be noted that the following does not constitute a full exhaustive list of all applicable requirements. The following matters are included for applicants consideration:

- *Trees, landscaping and Biodiversity*
- *Development Engineering*
- *Flooding*
- *Traffic*
- *Public Domain*
- *Roads / Street network*
- *Traffic Vehicle access and parking*
- *Contributions and Public Benefit*
- *Environmental Health*
- *Urban Design*
- *Ausgrid STSS*
- *Existing consent that applies to the site*

Trees, landscaping and biodiversity

Council acknowledges the Proponents response to the General Consultation comments from the meeting held on 13 March 2025 and including the intention to submit a Landscape Plan and Landscape Design Report with the EIS (and addressing compensatory/replacement plantings). Council recommends that any Landscape Plan with the EIS address the following.

Replacement Planting

The prescribed replacement planting ratio of 3:1 referenced in *Councils Draft Development Control Plan (Part 9.5) – Tree Preservation* would not apply to the area of regrowth trees identified in the approved excavated footprint under Modified Determination No. 1395/1999. Figure 5 shows the remnant vegetation that if removed requires replacement planting at a 3:1 ratio.

The prescribed replacement planting ratio of 3:1 would apply to the area outside the approved/excavated footprint. Any replacement tree planting not able to be accommodated within the lot may be considered for Council owned lands, including provision of street trees and native vegetation management more generally. On submission of the EIS, the applicant is to clearly demonstrate:

- Proposed number of trees being removed
- Number of trees being removed outside the existing approved footprint (excludes regrowth trees)

Should replacement plantings not be able to be undertaken on site due to location constraints, a fee per tree, as detailed in the City of Ryde's fees and charges, is to be paid to Council for the purposes of incorporating it into its street tree planting program. Should DPHI approve the application, Council would provide a recommended condition.



Figure 5: Extract showing Excavated footprint from November 2009 (Base Source: Ryde Maps)

Bush Fire Management

Any APZ requirements (including for the sub-station) must be made clear from the outset. Council also recommends that any material treatments for the landscape walk are composed of suitable bushfire retardant material.

Vegetation Management Plan

A Vegetation Management Plan is to be developed for the life cycle of the development which will focus on maximising the retention of existing native vegetation and prioritising regeneration of native vegetation over planting and landscaping, even if it takes longer to achieve. Sufficient maintenance works are to be planned and budgeted for over a longer period of time to allow for natural regeneration.

Implementation of the vegetation management plan should occur as soon as possible to protect and restore the vegetation, ensuring it is not an afterthought that commences when all other works are complete.

Seed collection from existing trees/plants on the site, especially those proposed for removal, should occur early on. Seed collected within the site can be used to propagate the plants that will be used in the landscaping.

Plant Community Type

Confirmation of the plant community type present using ground truthing. What was previously mapped in 2013 by Office of Environment and Heritage as 'Hornsby Enriched Sandstone Exposed Woodland' is now mapped as 'Sydney Coastal Enriched Sandstone Forest' (State Vegetation Type Mapping (2024) C2 M2 1).

The plant community information in the Landscape plan, obtained from the City of Ryde website dates from 2013 and is out of date. The latest State Vegetation Type Mapping (2024) C2 M2 1 should be used until area is ground truthed and the plant community type confirmed

Planting Palette

Due to the close proximity to the Lane Cove National Park the planning palette must closely reflect the existing plant community type. Species such as *Pennisetum sp.*, *Lomandra hystris* are not acceptable, despite being described as sterile hybrids. Locally indigenous species belonging to the correct plant community type shall be used, particularly throughout the southern portions of the site. Ideally seed would be sourced from within the lot would be used to propagate the plants.

Pedestrian access through the southern part of the site

The applicant is required to maintain the existing pedestrian access and upgrade the walking tracks and steps without impacting negatively on the adjoining native vegetation.

The proposed elevated boardwalks on the southern side of the proposed access road and sub-station are considered excessive. The elevated boardwalks would lead to more pruning and removal of trees and significantly increased maintenance costs than a regular pathway on-grade. Landscaping infrastructure that will impact trees and existing vegetation should be minimised.

Maximum retention of native vegetation and regeneration of native vegetation should be prioritised. Money saved on infrastructure can go into the long-term regeneration and maintenance of the native vegetation and weed control.

Development Engineering

Council acknowledges the Proponents response to the General Consultation comments from the meeting held on 13 March 2025.

Stormwater Management

- Two OSD systems are noted however there are no data/ calculations provided which clarify the OSD design parameters. Given the primary objective that the design should mimic state of nature conditions, this should be demonstrated in the final Civil report.
- Both OSD systems discharge to individual dispersal swales however the point of discharge for the northern portion of the service road (abutting Richardson Place) simply discharges to a stormwater culvert outlet with energy dissipater. This flow however will be directed to a carpark downstream and will have a detrimental effect on the amenity of this area. It is advised this drainage line should simply be redirected to the dispersal system adjacent the energy substation.
- It is noted there is a lack of consistency between the drafted Landscape and Civil plans. Particularly concerning the location of dispersal swales / dissipaters which are not located at all on the landscape designs.
- The plans / documentation at this stage are unclear on the level of rainwater reticulation is proposed. As noted previously, Sydney Water has conveyed concerns regarding water supply services within the Macquarie Park area and with this type of development anticipated to consume a higher proportion, it is sought that the application maximise the degree of rainwater reticulation being implemented.

Survey / Property Matters

- The development site has a number of easements traversing the lot and it appears that the drafted architectural plans, whilst in early stage, do not depict these easements traversing the site. It is suggested that the easements be marked on the plan and the EIS review these encumbrances.
- The plans propose the road up to Julius Avenue to straddle the joint boundary of the neighbouring lot to the west (10 Julius Avenue). Whilst there is a ROW easement which burdens the subject site, it is unclear if a reciprocal ROW is in effect on the 10 Julius Avenue or whether the adjoining land owner has consented for the road dedication, etc.

Flooding

Council acknowledges the Proponents response to the General Consultation comments from the meeting held on 13 March 2025 and including the intention to respond to all flooding matters as part of the EIS.

To inform the preparation of a Flood Study report/flood analysis requirements:

The site is found to be subject to flood inundation from Julius Avenue during the PMF and 1% AEP event. Refer to *Figure 5*. below.

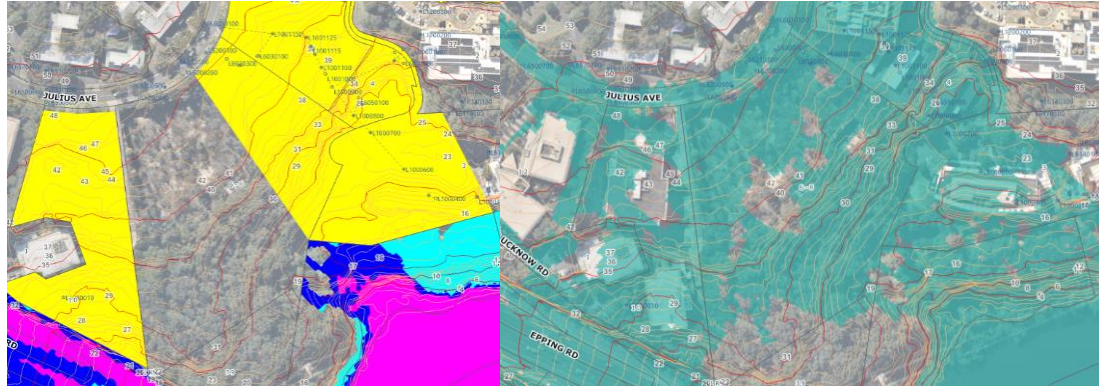


Figure 6. Extract showing Council 1% AEP Flood Risk Map on the left and PMF Flood Extent on the right (Source: Ryde Maps)

For the proposed Data Centre, the floor levels from Basement to Level 1 are nominated to be lower than existing natural ground subject to flooding during both 1% AEP and PMF events.

There are concerns regarding the potential flood impact of the Data Centre development on neighbouring sites during the PMF event as well as flood inundation within proposed building. Both these concerns shall be subject to review via detailed flood analysis.

The EIS is to include a detailed Flood study report that considers the following:

- A HEC-RAS / TUFLOW 2D computer model file analysing pre and post development situations to confirm that the proposal does not have adverse impact on the adjacent properties. The Proponent shall prove that the proposed development is not adversely affecting the flood conditions of neighbouring properties or downstream catchment.
- Electronic copies of the Hydraulic model (HEC-RAS/TUFLOW) shall be submitted to Council.
- If TUFLOW software is used, full electronic copies of executable TUFLOW modelling file compatible with QGIS software (including batch file for run and flood difference file) clearly identifying each scenario shall be submitted to Council for further assessment. Electronic copy of modelling results for pre and post development scenario for velocity, depth, flood level, VxD and VxD afflux, flood level afflux for 1% AEP in .asc format shall be submitted. If HECRAS 2D software is used, full electronic copies of executable HECRAS 2D modelling file compatible with QGIS software clearly identifying each scenario shall be submitted to Council for further assessment.
- Existing scenario flood levels shall be calibrated with the Flood Certificate levels provided by Council.
- The obtained Flood levels (Flood Levels Certificate) used to calibrate the model to be attached to the report.
- The pre and post development flood levels are to clearly be shown, inside the property and inside the neighbouring properties.
- The Proponent shall prove that the proposed development is not adversely affecting the flood conditions of all neighbouring properties or downstream catchment.
- Flood study shall be provided in colour and high quality.

- The freeboard requirements of Ryde DCP to be implemented in the design of the building areas. Refer to *Figure 7*. below.

Drainage System/ Overland Flow	Residential			Industrial/ Commercial	
	Land Level ^(b)	Habitable Floor Level	Non-Habitable Level ^(c)	Land Level ^(b)	Floor Level
Surface Drainage/ adjoining ground level ^(a)	-	.15m	-	-	.15m
Public drainage infrastructure, creeks and open channels	0.5m	0.5m	0.1m	0.3m	0.3m
Flooding and Overland Flow (Overland Flow Precincts and Low Risk)	N/A	0.3m	0.15m	N/A	0.3m
Flooding and Overland Flow (Medium Risk and greater)	N/A	0.5m	0.3m	N/A	-
Onsite Detention ^(d)	N/A	0.2m	0.1m	N/A	0.2m
Road Drainage Minor Systems (Gutter and pipe flow)		0.15m below top of grate			
Road Drainage		Refer to Figure 2-1.			
Detention Basins ^(e)		The top water level shall be designed to be 0.5m below top of embankment (100yr ARI)			

Table 2.1 Freeboard requirements.

Figure 7. Ryde DCP Part 8.2 Council free board requirements DCP extract

- VD product (Velocity x depth) of overland flows to be supplied and, if increased inside the development, restricted to below 0.4 m² /s. VxD map to be included in the Flood Study, including neighbouring properties (no increments in VD product is allowed inside the neighbouring property).
- Flood level must be shown clearly inside and outside the development site, including neighbouring properties with 0.2m contour interval for 1% AEP flood event and PMF.
- Flood Impact maps shall be submitted showing the variation in Flood Levels between the pre and post development scenarios for 1 in 100 yr ARI and PMF storm event. Flood Impact maps shall have 10-20mm intervals.
- Please provide VxD maps at 0.2 m²/s interval and VxD afflux map at 0.04-0.05 m²/s interval in the flood report for 1% AEP flood event and PMF. Please describe the flood level impact and VD impact inside and outside the development site due to proposed development in the report.
- Please provide a certificate from a flood engineer that any proposed basement openings are not inundated during PMF flood event.

Public Domain

Public Domain upgrade works must be completed along the Julius Avenue and Richardson Place frontages of the site in accordance with requirements of the *Design Guide for Macquarie Park Innovation Precinct* as issued in December 2024. Public domain works will include but are not necessarily limited to:

- Upgrade of granite footways
- Provision of street trees.
- Provision of lighting upgrade and installation of Multi-Function Pole (MFP) lighting in accordance with Council's schema.
- Street furniture

- Signage and line marking
- Bus Stop upgrades
- Disability access as required under the Disability Discrimination Act (DDA).
- Relocation and adjustment of utility assets as required to deliver public domain works required under the relevant planning guidelines.
- Works required to facilitate ongoing utility access and uninterrupted access along the site frontage.
- Undergrounding of any overhead cables along the frontage.

The EIS is to include details of the public domain works identified above.

Roads / Street network

The *Macquarie Park Design Guide* provides specific guidance to inform future development including objectives and provisions for new streets (location and design).

The *Street Network Map* (refer to *Figure 8*. below.) indicates that two new roads required within the site are to meet certain design standards including that they are to be 14.5m in width. Furthermore, the *Design Guide* requires a local scale road consistent with street type ST10 and including a two-way vehicular carriageway and a parking lane consisting of tree pit blisters and parking bays. The *Design Guide* also identifies these roads as part of the *Connecting with Country* pathway network. Please refer to *Figure 9*. Below.

However, the proposed roads (consisting of the existing 'half' right-of-way arrangement with 10 Julius Ave and a new access road) **will not** meet the specifications of the *Macquarie Park Design Guide*. For example, the future road extending from Julius Avenue along the western boundary of the site, is proposed to be only 5.0m in width.



Figure 8. Extract from Figure 4a. Street Network Map (Source: Updated Macquarie Park Design Guide)



Figure 9. Extract showing ST10 street type/road reserve arrangement (Source: Updated Macquarie Park Design Guide)

Council notes that the applicant intends to dedicate these roads to Council as the applicant does not want to be inconsistent with the Design Guide. As previously advised, this road has not been previously identified by Council in the RDCP 4.5 as a road that is required by Council. It was recently added in the Macquarie Park Design Guide.

In Councils view there is no strategic justification for these roads to become dedicated public roads as they are not required to provide access to other land parcels. Furthermore, the location of the development means that there is minimal connectivity benefit for other developments. However, there is a need for pedestrian connectivity to be provided from Julius Avenue through to the Great North Walk track.

Council notes that due to the operational requirements of a Data Centre with large and heavy vehicle movements it is not in Councils interests to receive a road that will largely service the development and may be impacted significantly by the operational requirements of a Data Centre. Given the above, Council does not consider it necessary for the roads to be dedicated to Council. This does not mean that the application would be inconsistent with the Design Guide. Council would support the applicant not dedicating this road to Council, but rather keeping it in private ownership.

It is suggested that these roads being provided as internal roads with public rights of way as the road widths are not consistent with the design guide and the design proposed by the applicant make it more suited for private ownership, rather than dedicated to Council. The Proponent will still need to demonstrate how the proposed roads would deliver the *Design Guide* objectives for the street network, and the provisions of the Designing with Country provisions in the *Design Guide*.

If the Proponent prefers for the roads to be dedicated to Council which Council is not supportive of, Council expects these to be delivered in a manner consistent with the *Design Guide* provisions for Streets and Landscape. It's noted that the 5m Road widths are not consistent with the Design Guides 14.5m (7.5m per lot). In this regard, as its Council's preference that the roads be retained in private ownership (with public right of way), it is not considered necessary to design the road to the 14.5m specifications in the design guide.

It is to be pointedly noted that Richardson Place is a private road (not public road under the care and control of a roads authority). This presents a number of potential issues and concerns, including whether the use of the road for construction access is legal and matters concerning public liability / indemnity.

In summary, road dedication is currently not supported, as the road lacks traffic functionality and does not offer any discernible public benefit. Please also refer to the Contributions and Public Benefit comments.

Connection with Future Road with Existing Private Road

The existing road which connects Richardson Place and the eastern side of the subject side is a private road through No.3 and No.4 Richardson Place with public access formalised through an access easement.



Figure 10: Extract showing ROW easements affecting the site and surrounding (Source: Ryde Maps)

Adjacent to the eastern boundary of the subject site the existing access road terminates in a cul-de-sac, arranged to provide for a significant number of parking spaces. The proposed connection to existing private road at eastern boundary of the site would need to consider maintaining or improving existing parking facilities and ensuring that the thoroughfare through the existing facilities on private property is safe and enables efficient vehicular movements.

The Applicant noted in the meeting that they intended to lodge a future DA to Council regarding parking spaces on 3 Richardson Avenue. A DA would be required for any future works on this lot. A condition of consent could be imposed on any SSD consent requiring the applicant lodge a DA to Council to resolve this matter.



Figure 11. Photo showing affected parking spaces (Source: City of Ryde Council)

Management of Subsurface Utilities

Council's experience with new data centres constructed in Macquarie Park to date, has been that the large volume of sub-surface communications utility that are installed, maintain and upgraded on regular basis, in the road reserves surrounding the new data centres, results in the following consequences for an extended period: -

- Dilapidation of Council infrastructure – roads, footpaths.
- Disruption to pedestrian vehicular access due to consistent trenching of Council infrastructure and other activities carried out by utility authorities.
- Exposure of the community to trip hazards associated with ongoing disrepair of footpaths.
- Environmental consequences resulting from ongoing works undertaken to install, upgrade and maintain communications utility assets.

The proposed data centre is considerably larger than all other data centres previously constructed or proposed with the LGA. It could be reasonably expected that this larger capacity would result in a much larger impact on surrounding Council infrastructure, than has previously been experienced with other data centres in Macquarie Park.

It is critical that provisions are made to minimise the impact of the consistent and ongoing installation, upgrade and maintenance of utilities of associated with the data centre.

It is noted that a Concept Communications Plan as well as other information on proposed utility installations was provided as part of the submission documentation in response to Council's initial comments requesting information on existing and expected subsurface utilities to be installed within the vicinity of the site.

While the effort made is appreciated and represents a positive start, additional information is required to address Council's concerns in relation to the future impact of ongoing trenching of public domain infrastructure surrounding data centres. Council's experience is that initial installations of communications utilities associated with data centres, established during construction, represent only a small proportion of comms assets connected to the data centre of ensuing years.

As such it is critical that planning for the data centre consider how large volumes of future communications assets can be installed with minimal ongoing impact and disruption to public domain infrastructure.

On submission of the EIS, please provide the additional information relating to management of post-construction expansions of communications asset installations, as per the below.

Request for Further Information

Council requests that the following information is provided to facilitate assessment: -

- Provide a public domain plan detailing the scope of public domain upgrade works to be delivered on existing road frontages as per the requirements of the Updated Design Guide, including the specified widths and layouts of the new roads within the site.
- Provide details of the new roads to be delivered (note Council will unlikely accept dedication). Details must include longitudinal and cross sections showing the connection between existing roads, new roads and the site frontage. Longitudinal sections should be provided at a conceptual level, showing the future connection between the site and Lucknow Road, to be delivered by others. The proposed levels of the road to be delivered under the development must accommodate future extension of the local road network to Lucknow Road.
- Provide plans detailing the connection between the existing private access road within No.3 Richardson Place, with consideration given to:
 - Maintaining the utility of existing parking facilities.
 - Providing for safe and efficient thoroughfare between the existing access road and the new portion of road extending from the eastern boundary of the subject site.

NOTE: Approval of any amendments within No.3 Julius Avenue pertaining to the connection with the private access road would be subject to input and approval from the property owner and as such it is recommended that they are involved in the process from the outset.

- The following additional information relating to subsurface infrastructure is requested by Council to enable a comprehensive review of factors impacting public domain infrastructure:
 - A report detailing how installation of the required subsurface infrastructure – not only prior to occupation, but also during expansion of infrastructure post occupation - will be installed at compliant depths and allocated alignments within the verge area to prevent future obstruction to public infrastructure upgrades. The report should also provide conceptual details of how subsurface installation will be managed to minimise the ongoing impact of trenching of public infrastructure and disruption to the community.
 - Consideration of how the future installation, upgrade and maintenance of subsurface utilities associated with the ongoing operation of the data centre can be undertaken without dilapidating Council infrastructure, disruption to vehicular and pedestrians movements and impacting the surrounding environment should be covered by the report. Specific consideration should be given to the provision of infrastructure to enable ongoing non-destructive access to subsurface utilities which would minimise the above issues.

Traffic, vehicle access and parking

- The submitted documentation indicates that 54 off-street car parking spaces are proposed for the development. However, the *TIA report prepared by PTC Consultants (dated 17 April 2025)* does not explain how this figure was determined or whether it is adequate for the development's needs. As off-street parking provision directly influences traffic generation, it is essential that the Proponent provide clear justification for the proposed number of spaces. Accordingly, the Proponent amends the TIA report to demonstrate that the provision of 54 car parking spaces is appropriate for the development.
- There is a lack of data in the parking analysis. There is a reference that the parking has been based on "operational requirements", but this is not clarified in the report any further and should be expanded upon. Per Council's previous general consultation comments, Council recommends that a detailed traffic and parking assessment

consider and provide adequate justification to the parking shortfall based on the land use.

- Section 4.2.2 of the TIA report assumes a 50% inbound and 50% outbound traffic split during both the morning and afternoon peak periods. This assumption is not appropriate for a commercial development, where traffic patterns typically show a higher proportion of inbound traffic in the morning and outbound traffic in the afternoon. It is therefore recommended that the traffic generation be revised to reflect a 90% inbound and 10% outbound split during the morning peak, and 10% inbound and 90% outbound during the afternoon peak. The TIA report should be amended accordingly to reflect these revised assumptions.
- Section 4.3 of the TIA report states that SIDRA Intersection modelling software was used to assess peak-hour performance at the intersections of Delhi Road/Julius Avenue West/Plassey Road, Delhi Road/Julius Avenue East, and Julius Avenue East/Richardson Place. However, the Julius Avenue/Rivett Road roundabout was not included in the network model, which compromises the accuracy of the modelling results. To ensure a complete and reliable assessment, the traffic modelling must be revised to incorporate the Julius Avenue/Rivett Road roundabout, and the TIA report updated accordingly.
- The proposal includes the construction of a data centre and a new Sub-transmission Switching Station (STSS) on the site. While the TIA report identifies Medium Rigid Vehicles (MRVs) as the largest vehicles accessing the data centre, it does not specify the largest vehicle expected to access the STSS. The Proponent must therefore provide additional information confirming the largest vehicle required to service the proposed STSS, supported by evidence from Ausgrid. If this vehicle is larger or longer than an MRV, the swept path plans must be updated accordingly.
- The submitted swept path plans indicate that an MRV can access the site via Julius Avenue and exit through the cul-de-sac at 3 Richardson Place, or vice versa. However, the plans also show that the MRV must use the full width of the roadway between Richardson Place and the cul-de-sac—particularly at tight bends—due to the narrow road geometry. Additionally, the MRV cannot safely pass a standard passenger vehicle along this section. This situation is unacceptable, as it poses significant safety risks along the access route to 3 Richardson Place. Accordingly, access to the site via Richardson Place is not supported, and all truck movements associated with the proposed data centre and STSS must be restricted to Julius Avenue.
- Whilst the plans are in early stage, further consideration is warranted to how the new road adjoining the western boundary will interact with traffic movements from 10 Julius Avenue, as well as pedestrian movements in this corridor.
- As mentioned in the section above, the roadway between Richardson Place and the buildings at 3 Richardson Place, including the cul-de-sac, is a **privately owned road with multiple owners**. Therefore, the proposed internal roads of the development cannot be connected to this private road unless a legal right-of-way easement exists. The Proponent must provide evidence that the roadway, including the cul-de-sac, is legally accessible for public use. If such evidence cannot be provided, the development plans must be amended to remove any connection between the site's internal road and the cul-de-sac.

Contributions and Public Benefit

The SSD seeks consent for a 7-storey data centre and associated infrastructure. Due to the nature of the proposed development, the SSD will utilise the incentive height provisions but not the incentive FSR provisions of RLEP. *Clause 7.7* permits development in accordance with the incentive provisions if the consent authority is satisfied that there will be adequate provision of recreation and access network infrastructure.

The incentive scheme was first implemented in 2014. It is the primary mechanism to deliver the fine grain road network and recreation areas in Macquarie Park. The foundation of the scheme is the provision of a monetary contribution to Council (in accordance with the incentive rate in Council's adopted Fees and Charges), to utilise the incentive height and FSR provisions. Where certain identified recreation and access infrastructure is directly provided by a development, the monetary contribution may be reduced by the value of this infrastructure. This offset is at Council's discretion.

Historically, the recreation and access infrastructure was identified in *Part 4.5 of the Ryde Development Control Plan (DCP)*. Since the NSW Government's rezoning on 27 November 2024, the infrastructure is identified within the *Macquarie Park Design Guide*. The *Design Guide* does not identify any recreation infrastructure on the Site. The *Design Guide* identifies a new section of local street (14.5m-wide) bisecting the property in an east-west direction. This local street is not identified in the DCP.

A Draft offer to enter a VPA (Offer) has been provided to Council. The Offer generally proposes:

- Payment of a monetary contribution to Council of \$179,943.84.
- An offset in the monetary contribution for:
 - The construction and dedication of a new east-west road on the site.
 - An easement for public access along an existing private driveway which connects Julius Avenue to the future new east-west road.
 - The provision of park benches within the front setback of the development site.
- An offset in future 7.11 contributions for \$160,000 which was previously paid to Council under development consent 1395/1999 dated 11 September 2005.

The provision of a VPA to satisfy the requirements of *RLEP Clause 7.7* is supported in principle. However, the following matters must be addressed in an updated Offer on submission of the EIS.

Calculation of floorspace

As the development is not seeking to utilise the incentive FSR provisions, the value of the monetary contribution has been determined based on the quantum of floorspace that utilises the incentive height provisions. This approach is consistent with previous advice from Council and is supported.

The Offer states that the floorspace utilising the incentive height provisions is approximately 558m² (being 496m² on Level 6 and 62m² on Level 7). The Sections should be updated to identify the base height which will facilitate an assessment of the Proponent's calculation.

Construction and dedication of new east-west road

The proposed new road does not provide a broader public benefit and its dedication to Council is not supported. The road will connect two sections of existing privately owned driveway on the adjacent properties and is not needed for public connectivity within the broader precinct. Additionally, the road does not appear to be designed in accordance with the *Design Guide*. The road should be retained in private ownership as outlined above. No offset will be provided for its construction.

Easement for public access

The Offer proposes to create easements for pedestrian access through the site, connecting Julius Avenue to the Great Southern Walking Track on the property's southern boundary. This pedestrian connectivity is supported in principle; however no offset is supported. The *Design Guide* does not identify this proposed connectivity as required recreation infrastructure. Any potential offset will reduce the available monetary contribution to provide the other identified infrastructure required to support the precinct.

Additionally, the Proponent should advise if they have consulted with the National Parks and Wildlife Service regarding the creation of a new access point to the National Park.

Offset for park benches in frontage to Julius Ave

The Offer proposes to provide park benches within the landscaped front setback to Julius Avenue. This is not identified recreation infrastructure under the *Design Guide* and does not provide a broader public benefit. No offset is supported for these works.

Offset for future 7.11 contributions

The Macquarie Park 7.12 Plan came into force on 2 May 2025 and will apply to this development. A contribution imposed under s 7.12 of the EP&A Act is not required to consider any contributions (monetary or otherwise) previously paid to Council.

On 29 August 2007, Council approved LDA 1395/1999 for a commercial development. A construction certificate was issued on 31 October 2007 and the consent was subsequently enacted. No record of the purported contribution payment has been found. Regardless, a credit for any 7.11 contribution that may have been paid 20 years ago under a different contribution scheme is not supported.

Timing of contribution

The Offer states that the monetary contribution will be provided prior to the issue of the first Occupation Certificate. This is not supported. The monetary contribution will be required prior to the issue of the first Construction Certificate.

Environmental Health

Council acknowledges the Proponents response to the General Consultation comments from the meeting held on 13 March 2025 and including the proposed mitigation measures for diesel leaks and additional tertiary protection measures.

The SEARs issued for the development requires a number of expert technical reports to be submitted with the EIS. Council will undertake a detailed review of the Proponent's expert reports once the EIS is submitted. These reports should generally consider:

- Air Quality Impact Assessment (including any emissions from the back-up power system).
- Noise and Vibration Impact Assessment (including accumulative impacts to the surrounding around and assessment potential future surrounding sensitive land uses).
- Surface and Ground Water Conditions /Impact Assessment (including Geotechnical Report assessing Groundwater, Salinity and Acid Sulphate Soils).
- A Contamination Assessment to ensure that the site is suitable for the proposed use.
- A Hazardous Materials Assessment in accordance with Resilience and Hazards SEPP 2021.
- A Waste Management Plan.

Urban Design

Fencing

Council does not support security fencing within Macquarie Park, particularly fencing that interfaces Julius Avenue. The provided landscape plan shows that security fencing is located at the Julius Avenue frontage. This is not supported as it presents as a hostile interface with the public domain. Council recommends that security fencing facing Julius Avenue is removed and alternative security options are explored.

Security fencing at the rear of the site interfacing the proposed access road can be considered given its level below street level and it not being visible from the street. It's recommended that any fencing in this location is pushed up against the buildings façade.

Setbacks (to Julius Avenue)

The response does not provide adequate justification for the proposed setbacks, particularly in relation to the required consideration of setback expansion to Julius Avenue. It is recommended that the Proponent consider revisiting this element of the proposal and in the context of local streetscape character. The Proponent should demonstrate how landscape setbacks to Julius Avenue contribute to overall streetscape character and pedestrian amenity. A minimum setback of 6m to Julius Avenue is preferred to allow for landscaping area and tree canopy.

CPTED

The EIS should be supported by a detailed Crime Prevention Through Environmental Design (CPTED) Strategy to ensure there is sufficient passive and active surveillance for pedestrians as they use the site links to access the great north walk.

Contributory frontages

Given the site has been identified with the Contributory Frontages along Julius Avenue in the *Design Guide* and it is opposite the existing retail and services centre of the business park as well as a preschool. It is noted that the proponent is reviewing the design as a response to the council's comment on ground level activation, but no details provided.

Request providing refined proposal showing the design solution responding to the required contributory frontage and street activation.

Floorplan & GFA calculation

The Level 6 is shown as a large plant room with only 484sqm GFA calculated from the office area at the north-western corner. It is unclear of the function and necessity of this plant room. Council also requests clarification of the plant room on Level 6. Investigate the option of relocate GFA or other uses to this level to reduce the building footprint and expand the setbacks. Please refer to *Figure 12*. below.

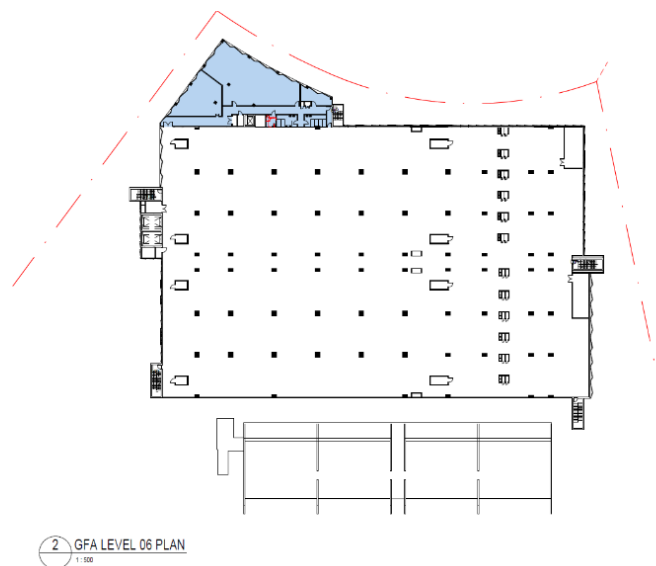


Figure 12. Proposed Level 6 plan extract (Source: Greenbox Architecture)

Building bulk & articulation:

The proposed data centre comprises a massive building footprint and building bulk. The building façade along Julius Avenue has a length of over 90m which is lack a of articulation under the current proposal. Whilst Council understands that the design is driven by the operational requirements of a data centre, the Proponent should demonstrate design considerations of articulation to mitigate the building bulk and enhance the building presentation and visual interests, particularly the façade along Julius Avenue.

Connecting with Country

The “Connecting with Country” section in the draft Landscape report has not been finalised and lacks design considerations of visual connections to the bushland.

The Proponent should demonstrate how the proposal aligns with the “Locality Statement” of Neighbourhood 7 and implements Connecting with Country design principles, particularly the relationship with the bushland and the notable views to the Lane Cove reserve from the public domain at vantage points near the site.

Other Environmental Considerations

A detailed Wind impact assessment is required to be included with the application. It is noted that the SEARs for the development does not include a wind impact assessment as relevant, however all development within Macquarie Park is subject to significant wind impact therefore warranting an assessment of impacts.

The Proponent is advised to consider Section 9.1 of the Ryde DCP 2014 Part 4.5 and provide a detailed wind impact assessment with the EIS that demonstrates no significant impact is caused on the public domain.

Ausgrid STS

General Comment

Council notes the SEARs item 22, which includes the requirement to “identify any infrastructure required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained.”

The proponent therefore needs to demonstrate that the STS can ‘work’ in the proposed location as part of its EIS, noting that the details of the STS development of the would be assessed under Part 5 of EPAA, with Ausgrid as the proponent. The material provided to date does not make it clear:

- How the facility will be maintained post-construction, particularly how design vehicles can access the STS for heavy maintenance such as transformer replacement.
- Utility high voltage power lines through the site and access arrangements to permit maintenance and renewal of these lines in the long term.

Visual Mass and reduction strategy

Noting the location of the STSS in the landscape buffer, it is important for the impacts of this facility to be minimised. Council considers that the current location, requiring over 4 metres of fill adjacent to the existing Great North Walk access track, and its exposure from above ground creates an unnecessary visual impact.

To assist alleviate the visual mass and bulk of the STSS protruding from the ground, Council suggests that public art be incorporated into the STSS. Council’s DCP 4.5 requires public art to be provided in all applications in Macquarie Park. Public Art can play an important role at

reducing the STSS visual impact on both the landscape setting and the future pedestrian interface.

To alleviate the STSS visual impact as a result of its bulk and scale the following items are recommended to be considered:

- Use public art to screen the STSS
- Have the STSS incorporate a public art mural/ painting
- Any public art can play an important role demonstrating connection to country and being visually sensitive to the ecological setting it is within

Location of STSS

The proponent is requested to engage with Ausgrid to consider the potential for the facility to be located adjacent to the boundary with 10 Julius Avenue, and the potential for the facility to be recessed at the high side (adjacent to the access road) to minimise fill requirements at the low side of the STSS.

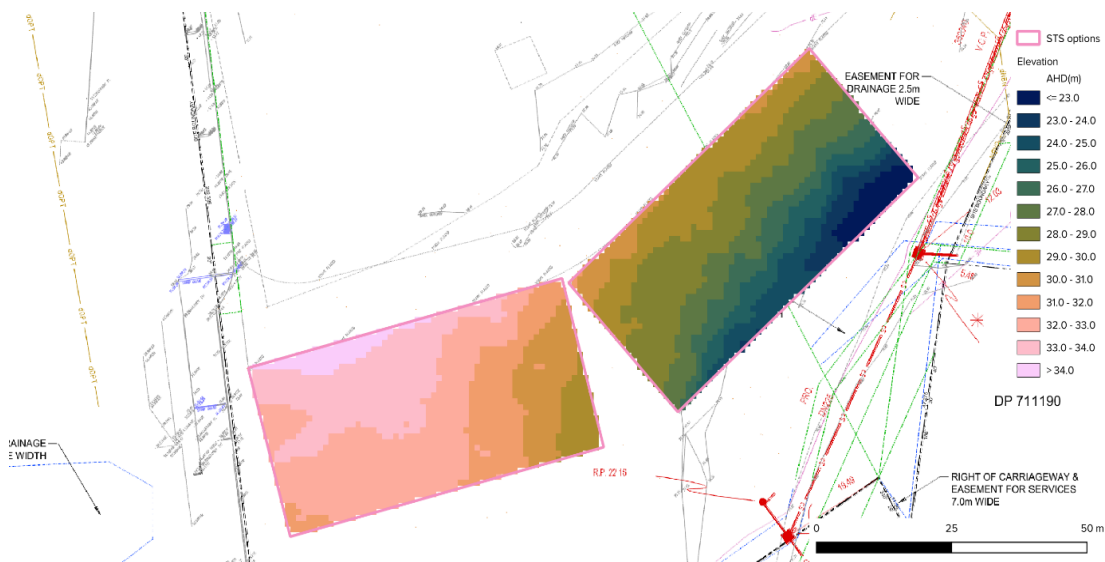


Figure 13: Mark up of possible area (Pink) for STSS to be located (Source: City of Ryde Council)

Council notes that the location of the substation will also depend on vegetation impacts and its location on important ecological. Given this the applicant is to clearly demonstrate in the EIS, why the final location of the STSS is most suitable.

Approval Pathways of the STSS

Regarding the STSS, Council reiterates the principles of *Bingman Catchment Landcare Group Incorporated v. Bowdens Silver Pty Ltd* [2024] NSWCA 205. This case is relevant to the proposed SSD & the STSS as the SSD Project hinges on the STSS being connected. Whilst it may form part of another planning pathway, its assessment of impacts must be considered as apart of the subject EIS.

The NSW Court of Appeal's decision in *Bowdens* found that 'enabling' infrastructure for State significant development (SSD) needed to be assessed as SSD (rather than under a separate planning pathway).

Council's preference is that the project for the STSS and the Data Centre are incorporated into 1 application, to enable a detailed assessment of impacts for both the STSS & Data Centre. Should the applicant not include the STSS in its EIS Package, the EIS must provide detailed consideration of the STSS and included resolved details. Council does not consider that the

STSS once at REF (Part 5) stage include numerous design revisions or deviate from the location or size as shown under the SSD, as the associated impacts will change.

Given this an indicative design scheme including associated environmental matters must be provided and demonstrated to have merit is to be provided with the detailed EIS. The associated documentation must consider the STSS in its assessment of the project.

If the Data Centre is to be approved a condition of consent is to be imposed on the SSD that requires an REF to be determined prior to the construction of the Data Centre. Similarly, the Data Centre cannot be operational until the REF for the STSS has been finalised. In this regard its recommended to engage with Ausgrid to ensure that these matters are considered early on, and timing is demonstrated should the SSD application not seek consent for the STSS.

If consent is sought for the STSS through the SSD process the above is not relevant given that a wholistic assessment would occur for both development elements.

Existing consent that applies to the site

Council notes that the site has an activated consent known as MOD No.1395/1999 that applies to the site. Should DPHI be minded granting consent to the proposed SSD application, the applicant would be required to surrender MOD D No.1395/1999 in accordance with Clause 67 of the *Environmental Planning and Assessment Regulations 2021*.

For any component of the commenced development a notice of surrender is to be provided to the Council in accordance with the EPAR 2021 requirements.

Council recommends that the application include a recommended condition of consent that satisfactorily addresses this matter.

OUTCOMES and SSDA Lodgement Requirements

Council thanks the Proponent for engaging early on the design and the outcomes proposed on the site. Council appreciates early engagements on State Significant Applications. This advice contains technical advice on detailed application matters that will assist the Proponent in preparing their EIS.

The advice contained within this report should be considered in conjunction with the issued SEARs for the development. Council recommends that any EIS submitted consider this advice and amend the design/ provide evidence with the EIS to address these issues.

Council thanks you for choosing to engage with us for formal Pre-Environmental Impact Statement Advice.

If you require any additional information regarding this matter, please contact Nic Najar- Acting Senior Co-Ordinator Development Advisory Service on 0403 215 603 or email to NicholasNa@ryde.nsw.gov.au

Yours sincerely

Nicholas Najar
Acting Senior Co-Ordinator
Development Advisory Services.

End of advice