ATTACHMENT 1

City of Ryde Submission
Road 1 Data Centre
1-5 Khartoum Road, Macquarie Park

SSD-80814238

Submission Date: 8 October 2025
COR2025/264/1

EXECUTIVE SUMMARY

Introduction

Thank you for inviting City of Ryde Council to comment on the Road 1 Data Centre, a State Significant Development Application (SSD-80814238) for the site known as 1-5 Khartoum Road, Macquarie Park and legally described as Lot 20 DP1319168.

The SSD Application seeks approval for site preparation works, the construction and operation of a 10 storey data centre, associated landscaping, utilities and services and the delivery of sections of Road 1 and Road 23 within the subject site.

The proposed data centre has a total power consumption of 34.3 megawatts and as such, is classified as a State Significant Development (SSD) under Schedule 1, Clause 25(1) of the State Environmental Planning Policy (Planning Systems) 2021.

Council notes that the applicant has undertaken consultation with Council prior to the lodgement of the application which has assisted in reducing the number of issues associated with the proposal.

After review of the detailed proposal Council's submission has identified a number of issues, that require resolution. Council believes these can potentially be collaboratively resolved between the applicant, DPHI and Council. Council's submission outlines issues and possible revisions/ resolutions.

In review of the Environmental Impact Statement (EIS) and supporting documentation several issues have been identified. The key issues identified with the application include:

- Construction and dedication of Road No.23 on subject site
- Clause 6.7 of Ryde Local Environmental Plan 2014
- Activation and interface with Road No.1
- Contributions and public benefit
- Urban design and architecture
- Traffic and Parking
- Public Domain
- Drainage/stormwater

Council believes the issues raised can be resolved collaboratively between the Applicant, DPHI and Council. Council's submission outlines issues with suggested revisions and/or ways to resolve issues that the Applicant is encouraged to consider and adopt.

Council submits its **comments** to the proposal for consideration by the DPHI and the applicant. Details of the issues are included below.

Detailed Consideration of the EIS and Feedback

1. Construction and Dedication of Road No.23 on Subject Site

It is noted that the site includes fine grain road, Road 23 and Road 1. The Traffic modelling for Macquarie Park rezoning had indicated that the fine grain road network would help alleviate traffic congestion from the key intersections in the precinct and would provide additional connectivity. This assertion was based on changes in land use to commercial / residential and other traffic generating developments in the locality.

The site now proposes a third Data Centre in the vicinity. The adjoining site (17-23 Talavera Road)

also contains a Data Centre. This has resulted in a significant shift from the traffic generating land uses envisaged in the Macquarie Park rezoning. Notwithstanding the Design Guide, any public benefit in providing another road extremely close and parallel to Khartoum Road is questionable. It is also important to note that the Key site planning controls do not prescribe or provide incentives for any new road traversing the site (Road 23).

While Road 1 provides continuation of the road from eastern side (approved on adjoining sites) and will also provide vehicular access to the proposed data centre, the application lacks details to demonstrate how Road No. 23 which currently leads to nowhere under the proposal (as it terminates without connection to Waterloo Road), and there is no turning circle or pedestrian connection to Waterloo Road. The future use of the remaining part of the site is unknown yet (other than the open space required under the key sites planning control). If road 23 were to be deleted from the current application, it is suggested that the section of road 23 be 'reserved' for future connectivity and in the interim could also be used as a pedestrian thoroughfare/active transport route until/if such time comes that the road will be completed.

Council's main concern is that road 23 does not provide any meaningful connection that would help alleviate traffic congestion. The dedication of the section of the road that does not connect to Waterloo Road does not provide any public benefit. However, it will impose an additional maintenance burden to Council of accepting a road.

The construction and dedication of Road No.23 may be supported in the future if it can be demonstrated that the road will provide public benefit and required connectivity to support traffic flow. If the road were to be accepted at this stage then Council would require inclusion of a separate deed for the developer to accept maintenance burden of the constructed portion of Road No.23 until such time as the owner develops the residual portion of the site located to the south-west. At that time, the remainder of Road No.23 would be delivered which would connect the initial portion of the road to Waterloo Road. Upon the connection, Council could then assume the maintenance burden of the entirety of Road No.23

2. Clause 6.7 of Ryde Local Environmental Plan 2014

Clause 6.7 of the Ryde Local Environmental Plan 2014 sates the following in relation to ground floor development in land on zone E3:

> *(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.*

The submitted architectural plans depict that car parking is proposed on the ground floor level, that is, the floor level that interfaces with proposed Road 1 (shown as upper ground floor on architectural plan with vehicular access shown). The Office floor level is located some 5.28m above the street level. Based on the details provided it is clear that the car parking is located on the ground floor level and not in the basement. This results in a major issue in terms of complying with Clause 6.7 of the RLEP2014.

The RLEP2014 defines basement as follows:

> *Basement means the space of a building where the floor level of that space is predominantly*

below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).

It is noted that the proposed development seeks to provide 19 car parking spaces at ground floor level. The exclusion for vehicular access in the Clause would only include access driveways or vehicle circulation areas and not car parking. The clause states that Consent must not be granted for development that contravenes its provisions. As a result, the applicant would need to explore other locations for the car parking such as a basement in order to satisfy the Clause.

It is also requested that additional sections through the car parking area be submitted to demonstrate that the car parking is located in a basement as per the definition and therefore that the proposal complies with Clause 6.7.

3. Activation and Interface with Road No.1

Under Section 5.4 of the Macquarie Park Design Guide, the subject site is identified as having a 'contributory frontage' to Road No.1, see below:

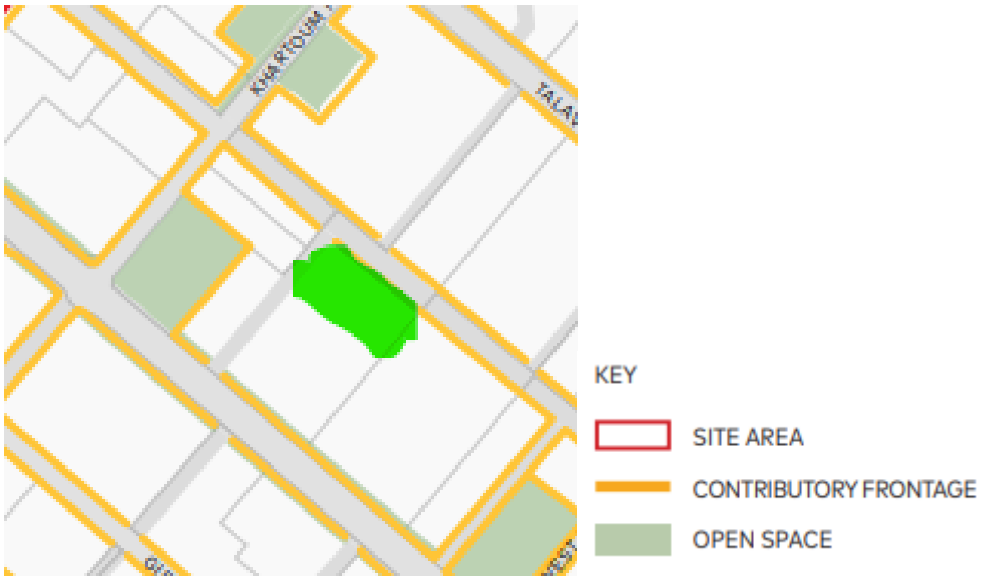

Figure 1 – Contributory frontages map. The subject site is highlighted in green. The plan shows the requirement for a contributory frontage to Road No.1

The Design Guide sets out the following expectations for contributory frontages:

2. Contributory frontages in Macquarie Park may be a mix of office premises, business premises, retail premises and Small Office/Home Office (SOHO) frontages.
a. Retail active frontages are to be provided on prominent corners and to provide amenity to public open spaces;
b. Commercial active frontages are to be provided along all frontages facing public streets and public open spaces, except where retail active frontages are provided;
c. Residential dwellings are generally not permitted along ground floor frontages, except for the limited use of Small Office/Home Office (SOHO) frontages.

The proposed building has a limited extent of activation and visual interest to Road No.1 at the ground floor and first floor levels. It is considered that larger windows along this elevation would assist in street level activation, improving the passive surveillance of streets and enhance the overall commercial character of the precinct.

The amalgamation of the loading dock and carpark entry is suggested (if feasible) as it would assist in the activation of this frontage.

4. Contributions and Public Benefit

The EIS contains a draft letter of offer to enter into a VPA. To date, the offer has not been separately submitted to Council. An assessment of the offer will occur concurrent to the assessment of the SSD. Council staff have reached out to the applicant to discuss the next steps.

The issues discussed under item 1 above should also be included in the VPA.
Generally, the proposed dedication of land and the construction of roads may be supported in principle. However, the proposed value of the offsets cannot be supported and needs further justification. Additionally, the offer seeks to offset the value of land/works against the required 7.12 contributions. This is inconsistent with the Macquarie Park Infrastructure Delivery Plan and the adopted 7.12 Contributions Plan (both prepared be DPHI) and is not supported.

5. Urban Design and Architecture

a) North-East Elevation
   - Carpark entry: In the SSDA Design Report there appears to be landscaping depicted between the loading dock and carpark entries, however, on the north-east elevation in the architectural plans there is not. Landscaping this space would reduce visual impact and improve the organic landscape design approach.

b) South-west elevation

   - Although the future through site link is located on the adjoining site, the design of the building should still facilitate passive surveillance of this area. This can be achieved by incorporating greater visual permeability.

6. Traffic and Parking

a) Clarification is required as to why this proposed data centre does not require 19m/20m long trucks, which are typically proposed for each of other data centres in Macquarie Park. This clarification is requested to address potential future challenges related to operating 19m/20m long trucks at the site.

   It is requested that an estimate of truck trips be provided based on the site's operational and maintenance requirements and assess their impact on the local road network. Specify the largest truck size and include swept path analyses for inbound and outbound movements at the intersections of Talavera Rd/Road 22, Road 22/Road 1, ensuring a MRV can safely pass a B99 car, and at the site access driveway.

b) The submitted Public Domain Civil Engineering Package provides the longitudinal alignment for Road 1 and Road 23. However, the alignment of Road 1 at its intersection with Road 22 (Murrell St) shows around 4% gradient within the intersection area. Given that the existing Road 22 is nearly level, therefore, the gradient of Road 1 at its intersection with Road 22 should be reduced to a maximum 3% and minimised where possible to improve connectivity with Road 22 and ensure adequate sight distance within the intersection area.
   Similarly, the intersection of Road 1 with Road 23 should have a maximum gradient of 3% to facilitate future connection with its western leg.

   A raised pedestrian crossing is required to be installed on Road 22 to facilitate pedestrian crossing along northern side of Road 1 to access the leisure space (small park), the through-site link and retail spaces at 11-17 Khartoum Road. The final location of the raised pedestrian crossing is subject to further investigation, and detailed surveys will be required.

c) The proponent is to consider appropriate ameliorative measures to minimise the impact of the proposed development on traffic safety and efficiency within the surrounding public road network. The location and the design of site access driveway is recommended to be optimised to minimise the loss of kerbside parking bays without compromising the road safety at vicinal intersections. For example, merging the site truck and car access driveways could be considered, given the low likelihood of conflicts between car and truck movements due to limited basement car parking spaces and a low turnover rate for car parking.

d) The design for all roads and intersections, pedestrian crossing, kerbside parking, internal parking and other traffic facilities are required to comply with Austroads Guidelines, Australian Standards AS 1742 and AS 2890, TfNSW supplements to Road Design Guides and other relevant guidelines.

e) A road safety audit is required for the new roads, the intersections of Road 1/Road 22 and Road 1/Road 23, raised pedestrian crossing, site access and other new traffic facilities prior to the issuance of the construction certificate and occupation certificate.

7. Public Domain

a) DWG No. C04.01 of the Public Domain Civil Engineering Package generally details correct arrangements, however, it is noted that on Road 23 only one separating tree planter is proposed which does not achieve the arrangement requirements in this capacity.

b) DWG No. C05.01 of the Public Domain Civil Engineering Package provides a longitudinal section – MC23- for Road 23, which shows longitudinal grades from the future Waterloo Road connection to Road No.1 ranging from 3.12% to 5.02% which is considered acceptable.

c) DWG No. C05.02 of the Public Domain Civil Engineering Package provides a longitudinal section – MC01- for Road 1, shows proposed longitudinal grades for the extent of the development works only. It is critical that the design considers the future connections to Khartoum Road and existing sections of Road 1. Failure to consider these future connections will result in a less than optimal overall road design. It is requested that an updated design considering and demonstrating adequate connection to, Khartoum Road and the existing sections of Road No.1 be provided.

d) The applicant is requested to provide kerb return sections to demonstrate adequate connection between Road No.1 and Road 22.

e) Section A on DWG No. C09.01 of the Public Domain Civil Engineering Package shows an extremely high retaining wall at the road reserve interface with Lots A and B. This is not an optimal interface between a road reserve and private lot. Notation on the plan shows a boundary line amendment – is it possible to utilise this 4.1m to provide a better interface in the interim before Lots A and B are developed.

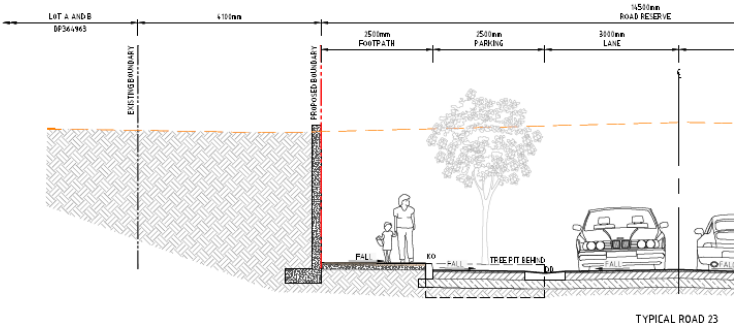

Figure 2 – Section depicting interface between road development site

f) The new roads to be delivered will result in two dead ends. There needs to be provision for signage and manoeuvring at points where the roads will terminate, to manage traffic during the interim period before the through road connections are constructed.

g) Previous comments to the applicant requested further information in regards to ongoing requirements for crane lifts, to enable Council to properly assess the potential impact upon its road pavement assets: -

- Will there be an operational requirement including maintenance, replacement, upgrades, to complete heavy lifts utilising future Council roads to support the lifts.
- If there will be a requirement, what will be the maximum mass of the crane lifts.
- Will crane lifts, supported by future Council roads be limited to one crane set up location or will this vary along the road reserves fronting the site.
- If the crane set up area will be limited, please specify the area that it will impact.

Additional information is required to address the above questions. The applicant is requested to show the proposed road profile and accompanying certification confirming that the proposed road profile will accommodate the crane lift loads.

h) Swept path analysis should be provided demonstrating that the proposed roads can accommodate Heavy Rigid Vehicle turning manoeuvres without encroachment across the centre lines.

8. Drainage/Stormwater

The future ownership of the proposed roads must be indicated on the Civil/stormwater plans. For roads that are being dedicated to Council, please see general requirements below for drainage assets:

- The design is to be in accordance with the Ryde DCP 2014 – Part 8.2 - Stormwater Management Technical Manual.

- New pipes proposed in Council Land, including the connection from the boundary pit to the proposed pit shall be steel reinforced concrete pipe, class 4, of minimum diameter >= 375mm.

- A Longitudinal Section to be provided and shall be cover compliance as per the Ryde DCP 2014 – Part 8.2 - Stormwater Management Technical Manual, Table 5.4. Please indicate the cover of the proposed pipe within Council land on the long section, and the type of RCP pipe (steel reinforced Class IV)

- Details of the connection to Council pits/pipe shall be included in the Stormwater Management Plan.

- A minimum 1% slope to be proposed for new drainage lines in Council land.

- Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plans, including details of the connection with the proposed stormwater system.

  Note: Please use Council asset numbers where applicable.

- Council Details shall be incorporated from Council Standard Drawings.

- Pipes to include Rubber ring joints.

- Any proposed junction pit to be constructed with concrete lid.

- Drainage network capacity analysis must be demonstrated to ensure the proposed development can be effectively drained and managed via the downstream drainage network.

The proposed stormwater management system within the site does not present any significant issues or areas of concern. A review of the plans and documentation note the following points;

- The on-site detention system is located on the high side of the site, contrary to typical design objectives, however the design still achieves the majority of hardstand area (i.e. roof) to discharge to the system.

- The internal stormwater plans are very conceptual and do not detail the exact configuration of the onsite detention system. It would appear that the volume of the system can be accommodated as the architectural plans have accommodated a considerable void in this region, however there are no details concerning the failure mode of the OSD system. By "failure mode", this refers to the ability to safely convey any surcharging water from the OSD system which may result if the downstream drainage system blocks or the system is subject to an extreme event, safely to public domain drainage without impacting on habitable areas on the subject site or neighboring properties. It is crucial that the OSD system make provision for the system to have an exposed overflow vent / weir allowing for the tank to surcharge to an external area should the downstream system be blocked. This is a crucial requirement and should be addressed by condition.

- Further to the above, the storage will require a number of manholes to ensure that access to the tank is readily attainable for the purpose of maintenance.

- The stormwater management plan is noted to accommodate stormwater runoff from the upstream lot, along the trunk drainage system adjoining the eastern boundary. This will require the registration of an Easement for Drainage of Water.

- The stormwater system on the subject site is to discharge to the new public drainage service in Road 1 and will not require an easement.

- The discharge from Road 1 will require a public drainage easement over downstream land and will require the consent and agreement of the downstream land owner(s). Should this easement not be in place prior to consent, it is prudently advised that any planning consent be configured as a deferred commencement as the process of formalising the easement may require a great period of time to resolve, being that the process is at the discretion of neighboring land owners.

- The land to be dedicated as public road must be free of burdens (i.e. all easements/ covenants are to be extinguished from the land). This process may require liaison with the beneficiaries of the instruments. It would be recommended that the applicant commence these investigations / actions as soon as possible.

Conclusion

City of Ryde Council thanks the Department for providing Council the opportunity to comment on the proposed SSD Application.

Council is **generally supportive** of the application. This submission outlines that there are matters to be addressed and welcomes the opportunity to collaboratively engage with the applicant and DPHI

to resolve these matters.

Should the Applicant or the Department wish to engage with Council directly on the issues raised above, Council would welcome the opportunity to consult with the Applicant or the Department.

Council's **comments** as outlined in this submission should be considered by the Applicant and DPHI.

End Submission