



WILLOWTREE PLANNING

AMENDMENT REPORT

Julius Avenue Data Centre

SSD-80018208

6-8 Julius Avenue, North Ryde
Lot 89 DP1082131

—

Prepared by Willowtree Planning Pty Ltd
on behalf of ISPT Pty Ltd

9 February 2026

Willowtree Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing and ongoing connections to land, waters, and community.

We acknowledge the Cammeraygal people, the Traditional Custodians of the land where this document was prepared, as well as the Traditional Owners of the Land where the proposed development will be located, the Gadigal people of the Eora Nation. We pay our respects to Elders past, present and emerging.

DOCUMENT CONTROL TABLE			
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Version and Date	Prepared by	Checked by	Approved by
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Version No. 02 - FINAL (9 February 2026)	Theo Klok Senior Planner	Andrew Cowan Director	
			

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AMENDMENT REPORTJulius Avenue Data Centre
6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

EIS Declaration

Declaration Form: Submission of EIS**Project Details**

Project name	Julius Avenue Data Centre
Application number	SSD-80018208
Address of the land on which the development is to be carried out	6-8 Julius Avenue, North Ryde

Proponent Details


Proponent name	ISPT Pty Ltd
Proponent address	L5, 24 York St, Sydney NSW 2000

Details of person by whom this EIS was prepared

Name	Theo Klok
Address	Level 4, 165 Walker Street North Sydney NSW 2060
Professional qualifications	Bachelor of Development Studies, University of Newcastle Bachelor of Business, University of Newcastle

Declaration by registered environmental assessment practitioner

Name	Andrew Cowan
Registration number	135475
Organisation registered with	PIA

Declaration	<p>The undersigned declares that this EIS:</p> <ul style="list-style-type: none">has been prepared in accordance with Part 8 of the <i>Environmental Planning and Assessment Regulation 2021</i>;contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;does not contain information that is false or misleading;addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>;contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;contains a consolidated description of the project in a single chapter of the EIS;contains an accurate summary of the findings of any community engagement; andcontains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	

Date	9 February 2026
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Appendix B	Updated Statutory Compliance Table	Willowtree Planning
Appendix C	Updated Mitigation Measures Table	Willowtree Planning
Appendix D	Supporting Studies	-
Appendix DD1	Estimated Development Cost Report	Rider Levett Bucknall
Appendix DD2	Architectural Drawings	Greenbox Architects
Appendix DD3	Architectural Design Report	Greenbox Architects
Appendix DD4	Survey Plan	Beveridge Williams
Appendix DD5	National Construction Code Compliance Report	BM+G
Appendix DD6	Accessibility Report	Greenbox Architects
Appendix DD7	Visual Impact Assessment & Report	Geoscapes
Appendix DD8	Transport Impact & Accessibility Impact Report	PTC
Appendix DD9	Construction Traffic Management Plan	PTC
Appendix DD10	Green Travel Plan	PTC
Appendix DD11	Landscape Plan	Arcadia
Appendix DD12	Landscape Report	Arcadia
Appendix DD13	Ecologically Sustainable Development Report	Arup
Appendix DD14	NABERS Embodied Emissions Form	Rider Levett Bucknall
Appendix DD15	Biodiversity Development Assessment Report	SLR Consulting
Appendix DD16	Backup Power Summary	IGS
Appendix DD17	Air Quality Impact Assessment	Northstar
Appendix DD18	Noise & Vibration Impact Assessment	Arup
Appendix DD19	Geotechnical Assessment	Douglas Partners
Appendix DD20	Surface & Groundwater Impact Assessment	Douglas Partners
Appendix DD21	Water Management Plan	TTW
Appendix DD22	Flood Impact Risk Assessment	TTW
Appendix DD23	Hazard & Risk Report	Omnii
Appendix DD24	Preliminary Site Investigation	Douglas Partners
Appendix DD25	Waste Management Plan	Waste Check
Appendix DD26	Aboriginal Cultural Heritage Assessment Report	GML Heritage
Appendix DD27	Statement of Heritage Impact	GML Heritage
Appendix DD28	Social Impact Assessment	Willowtree Communications
Appendix DD29	Infrastructure Delivery, Management & Staging Plan	IGS
Appendix DD30	Bushfire Assessment	Bushfire Code & Bushfire Hazard Solutions
Appendix DD31	Voluntary Planning Agreement	Addisons
Appendix DD32	Engagement Report	Willowtree Communications
Appendix DD33	Macquarie Park Design Guide Compliance	Willowtree Planning



Document	Prepared By
Appendix DD34 Preliminary Fire Safety Strategy	Vector Alliance
Appendix DD35 Wind Study	MEL Consultants

GLOSSARY OF KEY TERMS

Acronym/Abbreviation	Full Name/Title
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
APZ	Asset Protection Zone
AQIA	Air Quality Impact Assessment
ARI	Annual Recurrence Interval
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CFD	Computational Fluid Dynamics
CIV	Capital investment value
Council	City of Ryde Council
CTMP	Construction Traffic Management Plan
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
EPI	Environmental Planning Instrument
EPL	Environmental Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
FSR	Floor Space Ratio
GFA	Gross Floor Area
GHG	Greenhouse Gas
ICNG	Interim Construction Noise Guideline
IPST	ISPT Pty Ltd
KV	Kilovolt
LEP	Local Environmental Plan
LGA	Local Government Area



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m²	Square metres
MNES	Matter of National Environmental Significance
MRVs	Medium Rigid Vehicles
MW	Megawatt
NCC	National Construction Code
NPWS	NSW National Parks and Wildlife Services
NPfi	Noise Policy for Industry
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OSD	On-site detention
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PUE	Power Use Effectiveness
RFS	NSW Rural Fire Service
RL	Reduced level
RLEP	<i>Ryde Local Environmental Plan 2014</i>
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIP	Surface Inlet Pits
SSD	State Significant Development
STSS	Sub-Transmission Switching Station
Subject site/site/study area	6-8 Julius Avenue, North Ryde
TfNSW	Transport for NSW
VIA	Visual Impact Assessment
VPA	Voluntary Planning Agreement
Willowtree Planning	Willowtree Planning (NSW) Pty Ltd



EXECUTIVE SUMMARY

This Amendment Report has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of ISPT Pty Ltd. The Amendment Report is submitted to the New South Wales (NSW) Department of Planning, Housing and Infrastructure (DPHI), in support of an application for State Significant Development (SSD), for the construction and operation of a data centre at 6-8 Julius Avenue, North Ryde.

The proposed development originally incorporated the following:

- Minor earthworks involving cut and fill works;
- Site preparation works, including tree clearing;
- Earthworks and additional site retaining;
- Infrastructure comprising civil works and utilities servicing;
- Construction of a multi-level data centre, with the following;
 - Basement car parking for 54 cars (including 2 accessible spaces);
 - 12 data halls across six (6) 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;
- Provision for a future Ausgrid precinct-wide 132 KV STSS;
- One (1) new street through the southern part of the Site;
- Two (2) new pedestrian through-site links connecting Julius Avenue to the southern bushland;
- Complementary landscaping and offset planting;
- 1,393m² of ancillary offices and associated amenities; and
- Hours of operation being on a 24 hours per day, 7 days per week basis.

The SSD application and accompanying documentation were placed on public exhibition from 31 July to 27 August 2025, during which a number of submissions were provided to DPHI from the following agencies and authorities:

- DPHI (including Industry Assessments)
- Endeavour Energy
- City of Ryde (Council)
- Willoughby Council
- Sydney Water
- Transport for NSW (TfNSW)
- NSW Rural Fire Service (RFS)
- Fire and Rescue NSW (FRNSW)
- NSW National Parks and Wildlife Services (NPWS)
- Heritage NSW
- Heritage NSW – Aboriginal
- Environment Protection Authority (EPA)
- Department of Climate Change, Energy, the Environment and Water (DCCEEW); and
- Ausgrid;

In addition, community submissions were received members of the public. A response to these submissions is provided in **PART 5** of this Amendment Report.

Subsequently, amendments have been made to the proposed design and built form configuration in response to the submissions received and needs of future operators.

This Amendment Report is submitted in accordance with the *Environmental Planning and Assessment Regulation 2021, Division 2 Section 37 Amendment of development application*. It outlines the proposed amendments to the original development application and assesses the potential



environmental, economic, and social impacts of the amended project. This report has been prepared in accordance with the requirements of the *NSW State Significant Development Guidelines – preparing an amendment report* (October 2022) and should be read in conjunction with all documentation that forms the environmental impact statement (EIS) package.

Despite the proposal being amended, the overall scheme remains for the same purpose of a data centre (albeit a smaller extent), in line with the original proposal and is considered an improved outcome to the previously exhibited proposal.

PROJECT AMENDMENTS

The amendments pertaining to the development are summated as follows:

- **Operational capacity** – Reduction in facility capacity from 115.2MW to 76MW.
- **Cooling methods** - Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers.
- **Built form** – A reduction in storeys from 6 storeys to 4 storeys. Car parking is now to be located on the ground level, rather than the basement level. The building has also provided increases to setbacks and street activation to Julius Avenue.
- **Relocation of STSS** – The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW.
- **Vehicular access** – The Richardson Place connection through the site has been removed, with access to loading areas and STSS proposed from Julius Avenue only.
- **Pedestrian links** – Removal of western pedestrian connection to the Great North Walk.
- **GFA** - is now 16,647m².

The revised project is illustrated in a suite of revised architectural and landscape plans that accompany this Amendment Report. The proposed amended SSD Application seeks approval for the construction and operation of a data centre, including:

- Minor earthworks involving cut and fill works;
- Site preparation works, including tree clearing;
- Earthworks and additional site retaining;
- Infrastructure comprising civil works and utilities servicing;
- Construction of a multi-level data centre, with the following;
 - Ground level loading dock, services plantrooms and car parking for 38 cars, including 2 accessible spaces;
 - Eight (8) data halls across four (4) storeys with an IT load of 76 MW and a maximum power consumption of 120 MW, plus rooftop plant;
 - Three (3) storey office/front of house building;
 - Five (5) storey enclosed generator gantry to rear of data centre.
- New Ausgrid 132 kilovolt (KV) Sub-Transmission Switching Station (STSS);
- A new pedestrian through-site link from Julius Avenue to Richardson Place;
- Complementary landscaping and offset planting;
- 1,393m² of ancillary offices and associated amenities; and
- Hours of operation being on a 24 hours per day, 7 days per week basis.

CLARIFICATIONS TO THE EIS

Clarifications to the following information presented in the EIS are discussed in **Section 3.4**:

- Operational changes;
- Built form;
- Tree removal; and
- Vehicular and pedestrian access.



ADDITIONAL ASSESSMENTS SINCE THE EIS

Consideration of potential environmental, social and economic impacts informed the development of the revised proposal. An assessment of the amended scheme has been undertaken to evaluate the likely outcomes as compared to the environmental impacts described in the EIS.

In addition to updated reports prepared in the response to submissions, to support the additional impact assessment, the following additional or updated technical reports are provided as part of the amendment SSDA package:

- **Appendix A** Updated Project Description
- **Appendix B** Updated Statutory Compliance Table
- **Appendix C** Updated Mitigation Measures Table
- **Appendix D** Supporting Studies
 - **Appendix DD1** Estimated Development Cost Report
 - **Appendix DD2** Architectural Drawings
 - **Appendix DD3** Architectural Design Report
 - **Appendix DD4** Survey Plan
 - **Appendix DD5** National Construction Code Compliance Report
 - **Appendix DD6** Accessibility Report
 - **Appendix DD7** Visual Impact Assessment & Report
 - **Appendix DD8** Transport Impact & Accessibility Impact Report
 - **Appendix DD9** Construction Traffic Management Plan
 - **Appendix DD10** Green Travel Plan
 - **Appendix DD11** Landscape Plan
 - **Appendix DD12** Landscape Report
 - **Appendix DD13** Ecologically Sustainable Development Report
 - **Appendix DD14** NABERS Embodied Emissions Form
 - **Appendix DD15** Biodiversity Development Assessment Report
 - **Appendix DD16** Backup Power Summary
 - **Appendix DD17** Air Quality Impact Assessment
 - **Appendix DD18** Noise & Vibration Impact Assessment
 - **Appendix DD19** Geotechnical Assessment
 - **Appendix DD20** Surface & Groundwater Impact Assessment
 - **Appendix DD21** Civil Engineering Report
 - **Appendix DD22** Flood Impact Risk Assessment
 - **Appendix DD23** Hazard & Risk Report
 - **Appendix DD24** Preliminary Site Investigation
 - **Appendix DD25** Waste Management Plan
 - **Appendix DD26** Aboriginal Cultural Heritage Assessment Report
 - **Appendix DD27** Statement of Heritage Impact
 - **Appendix DD28** Social Impact Assessment
 - **Appendix DD29** Infrastructure Delivery, Management & Staging Plan
 - **Appendix DD30** Bushfire Assessment
 - **Appendix DD31** Voluntary Planning Agreement
 - **Appendix DD32** Engagement Report
 - **Appendix DD33** Macquarie Park Design Guide Compliance
 - **Appendix DD34** Preliminary Fire Safety Strategy
 - **Appendix DD35** Wind Study

An Updated Statutory Compliance Table has been provided in **Appendix B** .

A consolidated summary of management and mitigation measures has been provided following the above additional assessments, to address the refinements made to the project, and matters raised in the submissions. This is referenced in the attached Mitigation Measures document - refer to **Appendix C**.



PART 5 of this Amendment Report provides a summary of the submissions received following exhibition, and a Response to these Submissions is provided).

CONCLUSION

The Amendment Report has determined that the amendments proposed would not result in any significant adverse impacts to environmental, cultural, social and economic values. Rather, that such impacts are lessened through the incorporated amendments.

The amended proposal has been refined as described above. The impacts have been concluded as being generally consistent with those previously presented in the EIS and will result in an improved built form outcome. Any potential residual impacts can be suitably controlled with the management and mitigation measures proposed.



PART 1 INTRODUCTION

1.1 OVERVIEW

This Amendment Report has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of ISPT Pty Ltd (IPST). The Amendment Report is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), in support of the proposed modification of already submitted SSD-80018208 for the Julius Avenue Data Centre at 6-8 Julius Avenue, North Ryde.

The modifications sought have been assessed against the original Secretary's Environmental Assessment Requirements (SEARs) throughout this Amendment Report, confirming that the proposal remains substantially the same development, as approved.

The structure of this Amendment Report has been prepared in accordance with the NSW DPE's *State Significant Development Guidelines – Preparing an Amendment Report* as follows:

- PART 1 - INTRODUCTION
- PART 2 - STRATEGIC CONTEXT
- PART 3 - DESCRIPTION OF THE MODIFICATIONS
- PART 4 - STATUTORY CONTEXT
- PART 5 - ENGAGEMENT
- PART 6 - ASSESSMENT OF IMPACTS
- PART 7 - PROJECT JUSTIFICATION
- PART 8 - CONCLUSION

1.2 THE PROJECT INCLUDED IN THE ORIGINAL DEVELOPMENT

The particulars of the original proposal are summarised below:

- *Minor earthworks involving cut and fill works;*
- *Site preparation works, including tree clearing;*
- *Earthworks and additional site retaining;*
- *Infrastructure comprising civil works and utilities servicing;*
- *Construction of a multi-level data centre, with the following;*
 - *Basement car parking for 54 cars (including 2 accessible spaces);*
 - *12 data halls across six (6) 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;*
- *Provision for a future Ausgrid precinct-wide 132 KV STSS;*
- *One (1) new street through the southern part of the Site;*
- *Two (2) new pedestrian through-site links connecting Julius Avenue to the southern bushland;*
- *Complementary landscaping and offset planting;*
- *1,393m² of ancillary offices and associated amenities; and*
- *Hours of operation being on a 24 hours per day, 7 days per week basis.*

The proposed revised project description is provided in **Section 1.4**.

1.3 BACKGROUND

A chronology of events that has occurred to date on the SSD is provided below:



TABLE 1: BACKGROUND TO SSD

Date	Event
12 February 2025	Request for industry specific Secretary's Environmental Assessment Requirements (SEARs) was submitted to DPHI.
20 February 2025	Industry specific SEARs were issued by DPHI
24 June 2025	Original SSD formally lodged with DPHI.
31 July – 27 August 2025	The original SSD application and accompanying documentation were placed on public exhibition
28 August 2025	DPHI issued a Request for Response to Submissions and Additional Information letter.
16 January 2026	Amendment Report lodged with DPHI, including response to submissions.

1.4 PROJECT AMENDMENTS

1.4.1 Proposed Amendment

The proposed project amendments include the following:

- **Operational capacity** – Reduction in facility capacity from 115.2MW to 76MW.
- **Cooling methods** - Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers.
- **Built form** - A reduction in storeys from 6 storeys to 4 storeys. Car parking is now to be located on the ground level, rather than the basement level. The building has also provided increases to setbacks and street activation to Julius Avenue.
- **Relocation of STSS** – The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW.
- **Vehicular access** - The Richardson Place connection through the site has been removed, with access to loading areas and STSS proposed from Julius Avenue only.
- **Pedestrian links** – Removal of western pedestrian connection to the Great North Walk.
- **GFA** - is now 16,647m².

These amendments are necessary to improve the design of the project, respond to issues raised by the community in public submissions or further mitigate the impacts of the project.

The amendments are further discussed in **PART 3** of this report, and a summary of the key changes to development particulars is provided in **Section 3.2**.

1.4.2 Amended Development Description

The proposed SSD Application seeks approval for the construction and operation of a data centre, including:

- *Minor earthworks involving cut and fill works;*
- *Site preparation works, including tree clearing;*
- *Earthworks and additional site retaining;*
- *Infrastructure comprising civil works and utilities servicing;*
- *Construction of a multi-level data centre, with the following;*
 - *Ground level loading dock, services plantrooms and car parking for 38 cars, including 2 accessible spaces;*
 - *Eight (8) data halls across four (4) storeys with an IT load of 76 MW and a maximum power consumption of 120 MW, plus rooftop plant;*
 - *Three (3) storey office/front of house building;*
 - *Five (5) storey enclosed generator gantry to rear of data centre.*



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- *New Ausgrid 132 kilovolt (KV) Sub-Transmission Switching Station (STSS);*
- *A new pedestrian through-site link from Julius Avenue to Richardson Place;*
- *Complementary landscaping and offset planting;*
- *1,393m² of ancillary offices and associated amenities; and*
- *Hours of operation being on a 24 hours per day, 7 days per week basis.*

1.5 ESTIMATED DEVELOPMENT COST

In accordance with Schedule 1, Clause 25 of the Planning Systems SEPP, development for the purposes of a *data centre* that has a power consumption in excess of 15MW, constitutes SSD irrespective of the cost of the development. The EDC of the previous scheme was approximately \$1.584 billion. The revised EDC of the proposed development will be approximately \$1,267,188,384, in accordance with the definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation).

1.6 THE PROPONENT

The land that is the subject of this application, is owned by the proponent. Landowner's consent has been obtained to lodgement of this SSD. See **TABLE 2** below for contact details.

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	ISPT Pty Ltd (ACN 064 041 283)
Contact Name	Matthew Cox
Position	Project Director, Industrial
Contact Number	0409 842 275
Email Address	mcox@ispt.com.au



PART 2 STRATEGIC CONTEXT

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this Amendment Report, is located at the following land parcel:

TABLE 3: SITE DETAILS

Address	Lot/DP
6-8 Julius Avenue, North Ryde	Lot 89 DP1082131

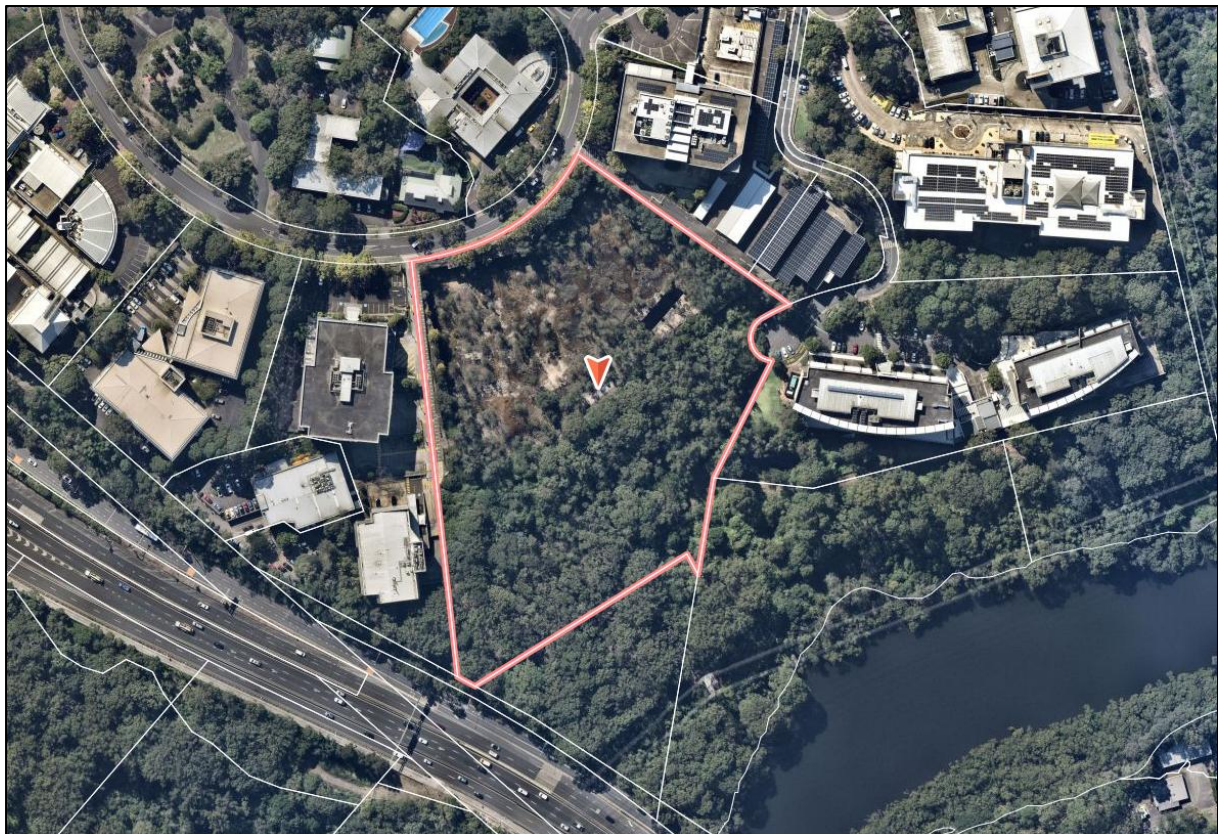


Figure 1: Site Aerial (Nearmap, 2025)

An overview of the site characteristics is included in **TABLE 4** as follows.

TABLE 4: SITE CHARACTERISTICS

Component	Description
Address	6-8 Julius Avenue, North Ryde
Legal Description	Lot 89 DP1082131
Site area	2.863 ha
Current use	The Site is currently vacant.
Topography	Ground surface levels within the Site typically fall steeply from the street level (approximately 48 m AHD) to the previously excavated open-cut sandstone pad which covers the northern portion of the Site (at approximately 35 m AHD).



TABLE 4: SITE CHARACTERISTICS	
Component	Description
	The land in the southern portion of the Site then falls steeply to the south towards Lane Cove River, with the southern boundary being at approximately 24 m AHD.
Access	The current vehicular access to the Site is via a shared driveway along the western boundary from Julius Avenue.
Vegetation	The northern portion of the Site has been heavily disturbed due to excavation of sandstone bedrock in 2009 and contains only regrowth vegetation. The southern portion of the Site contains mostly native forest vegetation in moderate to good condition. The remaining parts of the Site contain hardstands in the form of exposed sandstone bedrock and outcrops, and non-native vegetation containing exotic thickets dominated by privet and lantana.
Watercourses	There are no watercourses located on the Site.
Wetlands	No mapped local or important wetlands occur within the Site.
Biodiversity	No areas of outstanding biodiversity value lie within the Site.
Easements and encumbrances	The Site is burdened by several easements and encumbrances, pertaining to various infrastructure services, including water, sewerage and electricity, and access.
Heritage	The Site has been the subject of an Aboriginal Cultural Heritage Assessment Report (ACHAR), and Heritage Due Diligence Assessment (see Appendix DD26 and Appendix DD27 respectively). The Site has been assessed as unlikely to contain any intact Aboriginal sites and has therefore been assessed as holding low archaeological potential. Furthermore, the Site is not listed on the State Heritage Register (or subject to an interim heritage order) under the <i>NSW Heritage Act 1977</i> and is not identified as an item of environmental heritage or within a heritage conservation area on any EPIs.

2.2 Development History

TABLE 5 below provides a summary of the relevant development consents obtained on the Site and of relevance to this Proposal.

TABLE 5. EXISTING DEVELOPMENT CONSENTS		
DA Reference	Summary	Approval Date
1395/1999	Construction of four (4) and six (6) storey commercial buildings over basement car parking.	11 September 2005

Determination No. 1395/1999, dated 11 September 2005, approved construction of four (4) and six (6) storey commercial buildings over basement car parking on the Site.

The northern part of the Site was partially excavated and cleared as part of Modified Determination No. 1395/1999 and therefore it is understood that this consent is still active. The Site has remained vacant since the excavation and vegetation clearing was carried out in 2009.

A copy of the approved Site Plan is provided in **Figure 2** below and illustrates four (4) separate commercial buildings with a combined GFA of 36,648m² and significant vegetation clearing.



Determination No. 1395/1999 includes provision for two (2) additional commercial buildings on the south-eastern part of the Site in the existing densely vegetated part of the Site.

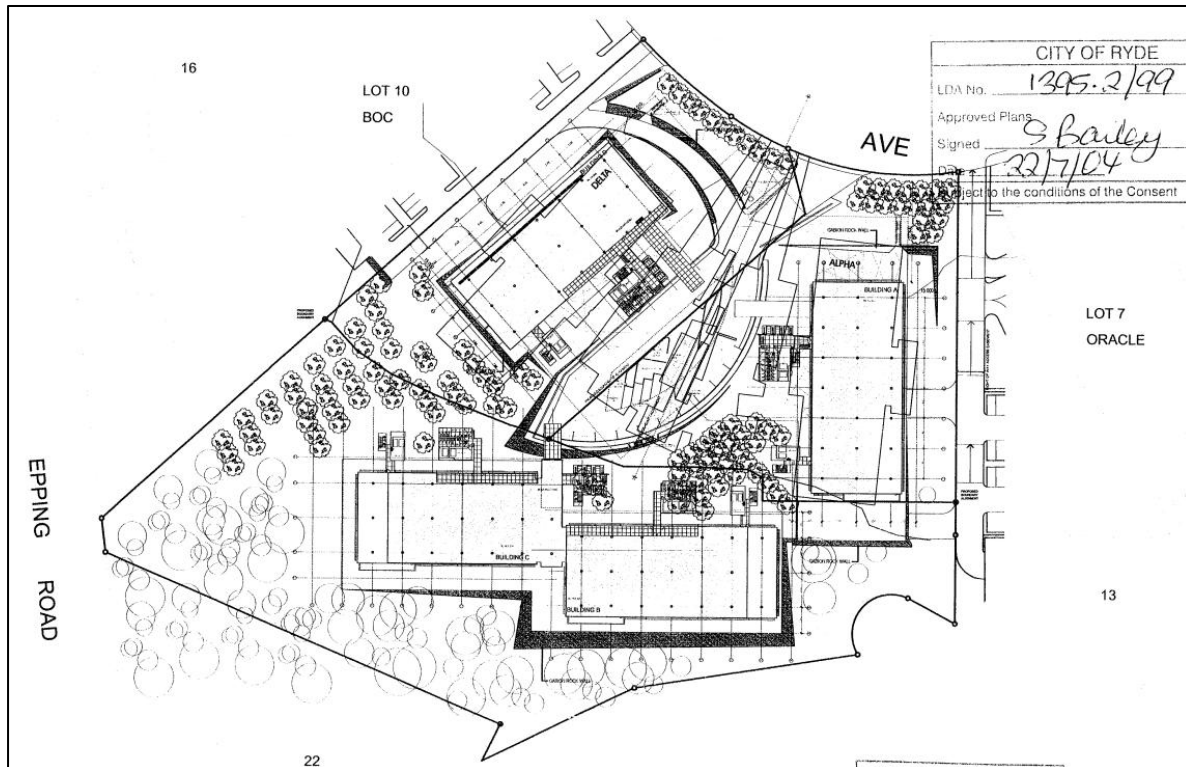


Figure 2: Site Plan - Modified Determination No. 1395.2/99 (City of Ryde Council, 2025)

2.3 Site Context

The subject site is located to the east of the CBD of North Ryde on the opposing side of the Hills Motorway, and to the east of the locality of Macquarie Park. The North Ryde Metro station is located approximately 550m to the north-west. The built form and character of the area predominately comprise of business and educational premises within multi-storey buildings.

The area comprises of several head offices, laboratories as well as a veterinary hospital, and the Macquarie Park Cemetery and Crematorium.

2.4 STRATEGIC PLANNING CONTEXT

A detailed discussion of the strategic context for the project is provided in **Chapter 2** of the EIS. A summary of the relevant strategies, policies and guidelines as discussed in the EIS are addressed in **TABLE 6** below.

TABLE 6: STRATEGIC PLANNING CONTEXT		
Planning Document	Applicability	How Development Aligns
Greater Sydney Region Plan - A Metropolis of Three Cities	The proposed development contributes to the four (4) standardised elements communicated across for all three (3) cities, including: <ul style="list-style-type: none"> • Infrastructure and collaboration - once in operation, the development 	The Proposal aligns with the vision and objectives for the Eastern Economic Corridor in that the Proposal will facilitate the provision of employment and economic activity which is well connected to transport links. The Eastern Economic Corridor extends from



TABLE 6: STRATEGIC PLANNING CONTEXT

Planning Document	Applicability	How Development Aligns
	<p>would be able to provide secure, reliable and adaptable solutions for cloud, content and large enterprise customers to house their high and rapidly growing volumes of data and information. The infrastructure has been designed to meet future needs.</p> <ul style="list-style-type: none"> • Liveability - the Proposal encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality. • Productivity - the Proposal is situated within the <i>North District Plan</i> and will support the retention and efficient use of industrial land; and, • Sustainability - the Proposal would not exhibit or emit any detrimental impacts to its wider ecological surroundings and is consistent with the principles of ESD. 	<p>Macquarie Park to Sydney Airport and is an important contributor to the economic growth of the state.</p>
<p>North District Plan</p>	<p>The subject site forms part of the North District, which includes actions to guide growth, development and change, relating to infrastructure & collaboration, liveability, productivity and sustainability</p>	<p>The Proposal would contribute to the objectives set out in the <i>North District Plan</i> by promoting a greater range of land uses of benefit to the community including the proposed Data Centre and other commensurate land uses; facilitating the provision of greater and improved infrastructure; and, promoting additional employment-generating opportunities (relevant to the proposed development) to the wider locality and community closer to home, whilst supporting an economically and environmentally sustainable development.</p>
<p>Ryde Local Strategic Planning Statement 2020</p>	<p>The Planning Ryde Local Strategic Planning Statement 2020 (Ryde LSPS) applies to the Site. The Ryde LSPS outlines the 20-year planning vision for the City of Ryde LGA. The plan aims to create a liveable, prosperous and connected city that</p>	<p>Planning Priorities M1 and M2 of the Ryde LSPS seek to ensure the economic vitality of the Macquarie Park Health and Education Strategic Centre and retain the precinct's strong economic base as shown by its contribution to</p>



TABLE 6: STRATEGIC PLANNING CONTEXT		
Planning Document	Applicability	How Development Aligns
	<p>that provides for the LGA's future needs while protecting nature and history.</p> <p>The Site is located within the Macquarie Park Precinct land as identified in the LSPS, which is home to 96,500 jobs, and contributes \$15.47 billion to GRP.</p>	<p>Australia's GDP. The Proposal represents a significant investment in the Precinct and will offer crucial data storage capacity near key health and education institutions, supporting the infrastructure needs of these sectors.</p> <p>Planning Priority M6 and E1 seek to protect and enhance bushland, biodiversity, environmentally sensitive waterways, scenic and cultural landscapes. The Proposal involves significant enhancement to the bushland on the Site and protects important biodiversity.</p> <p>The Proposal is also consistent with Planning Priorities M5, M6, M7, OS1, OS2, and OS5 by providing recreation space that can be shared and enjoyed by all.</p>
Future Transport Strategy 2056	<p>The <i>Future Transport Strategy 2056</i> is a 40-year strategy, supported by plans for regional NSW and for Greater Sydney. The strategy and plans focus on the role of transport in delivering movement and place outcomes that support the character of the places and communities that are desired for the future.</p>	<p>The Proposal aligns with the strategies of the <i>Future Transport Strategy 2056</i> on the following basis:</p> <ul style="list-style-type: none"> ▪ the Site has access to regular public transport services and is accessible by active transport; ▪ parking provision is appropriate; ▪ access, servicing and internal layout will be provided in accordance with Australian Standards AS2890.1-2004 and AS2890.2-2018; and ▪ the surrounding road network and intersections will be able to cater for the proposed development traffic.



PART 3 DESCRIPTION OF AMENDMENTS & CLARIFICATION

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the Proposal is to provide a purpose-built development encompassing a data centre and associated infrastructure and amenities in line with Industry Best Practice, resulting in:

- Support the growth and transformation of the IT sector;
- Generate employment - during construction and once the development is operational;
- Improve access to jobs for residents of the immediate community and wider locality;
- Supplement, support and complement the Macquarie Park Precinct and its strategic intent;
- Demonstrate architectural excellence, through siting and design compatibility, with minimal visual impact; and
- Provide suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future.

3.2 PROPOSED AMENDMENTS

The proposed use and operation of the data centre building remains generally as detailed in **PART 3** of the EIS (prepared by Willottree Planning). However, a number of changes are now proposed as detailed in this section.

The proposed project amendments include the following:

- **Operational capacity** - Reduction in facility capacity from 115.2MW to 76MW.
- **Cooling methods** - Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers.
- **Built form** - A reduction in storeys from 6 storeys to 4 storeys. Car parking is now to be located on the ground level, rather than the basement level. The building has also provided increases to setbacks and street activation to Julius Avenue.
- **Relocation of STSS** - The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW.
- **Vehicular access** - The Richardson Place connection through the site has been removed, with access to loading areas and STSS proposed from Julius Avenue only.
- **Pedestrian links** - Removal of western pedestrian connection to the Great North Walk.
- **GFA** - is now 16,647m².

An overview of the amended project compared to the project included in the original development application is provided in **TABLE 7** below.

TABLE 7: PROPOSED DEVELOPMENT PARTICULARS		
Project Element	Original	Amended
Site Area	28,630m ² - unchanged.	
Primary Land Use	Data centre - unchanged.	
Ancillary Land Uses	Ancillary offices and amenities - unchanged.	
Project Description	<ul style="list-style-type: none"> ▪ Minor earthworks involving cut and fill works; ▪ Site preparation works, including tree clearing; ▪ Earthworks and additional site retaining; 	<ul style="list-style-type: none"> ▪ Minor earthworks involving cut and fill works; ▪ Site preparation works, including tree clearing; ▪ Earthworks and additional site retaining;



TABLE 7: PROPOSED DEVELOPMENT PARTICULARS

Project Element	Original	Amended
	<ul style="list-style-type: none"> ▪ Infrastructure comprising civil works and utilities servicing; ▪ Construction of a multi-level data centre, with the following; <ul style="list-style-type: none"> ○ Basement car parking for 54 cars (including 2 accessible spaces); ○ 12 data halls across six (6) 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; ▪ Provision for a future Ausgrid precinct-wide 132 KV STSS; ▪ One (1) new street through the southern part of the Site; ▪ Two (2) new pedestrian through-site links connecting Julius Avenue to the southern bushland; ▪ Complementary landscaping and offset planting; ▪ 1,393m² of ancillary offices and associated amenities; and ▪ Hours of operation being on a 24 hours per day, 7 days per week basis. 	<ul style="list-style-type: none"> ▪ Infrastructure comprising civil works and utilities servicing; ▪ Construction of a multi-level data centre, with the following; <ul style="list-style-type: none"> ○ Ground level loading dock, services plantrooms and car parking for 38 cars, including 2 accessible spaces; ○ Eight (8) data halls across four (4) storeys with an IT load of 76 MW and a maximum power consumption of 120 MW, plus rooftop plant; ○ Three (3) storey office/front of house building; ○ Five (5) storey enclosed generator gantry to rear of data centre. ▪ New Ausgrid 132 kilovolt (KV) Sub-Transmission Switching Station (STSS); ▪ A new pedestrian through-site link from Julius Avenue to Richardson Place; ▪ Complementary landscaping and offset planting; ▪ 1,393m² of ancillary offices and associated amenities; and ▪ Hours of operation being on a 24 hours per day, 7 days per week basis
Total GFA	26,076m ²	16,647m ²
Floor Space Ratio	0.91:1	0.58:1
IT Load	115.2 MW	76MW
Max. Power Consumption	169 MW	120MW
Data Halls	12 data halls	8 data halls
Building Height	50.93m	40m
Number of Storeys	<ul style="list-style-type: none"> ▪ Seven (7) storey data hall building ▪ Five (5) storey office/front of house building ▪ Six (6) storey enclosed generator gantry 	<ul style="list-style-type: none"> ▪ Four (4) storey data hall building ▪ Three (3) storey office/front of house building ▪ Five (5) storey enclosed generator gantry



TABLE 7: PROPOSED DEVELOPMENT PARTICULARS		
Project Element	Original	Amended
Setbacks	Minimum setbacks: <ul style="list-style-type: none"> ▪ 5m to Julius Ave ▪ 5m to south-western side ▪ 5m to north-eastern side 	Minimum setbacks: <ul style="list-style-type: none"> ▪ 6m to Julius Ave ▪ 6m to south-western side ▪ 6m to north-eastern side
Tree Removal	<ul style="list-style-type: none"> ▪ A total of 60 trees are proposed for retention (not including trees within the dense bushland area) ▪ A total of 509 trees are proposed for removal (in 188 tree groups) 	<ul style="list-style-type: none"> ▪ A total of 235 trees are proposed for retention (not including trees within the dense bushland area) ▪ A total of 334 trees are proposed for removal (in 133 tree groups)
Tree Planting	<ul style="list-style-type: none"> ▪ A total of 143 new trees 	<ul style="list-style-type: none"> ▪ A total of 36 new trees
Canopy Cover	7,203m ² (25.16% of the Site area)	5,512m ² (19.24% of the Site area)
Deep Soil Landscaping	9,196m ² (32.12% of the Site area)	14,264m ² (49.8% of the Site area)
Car parking	54 car parking spaces including 2 accessible	38 car parking spaces including 2 accessible
Bicycle facilities	6 bicycle racks	4 bicycle racks
End of Trip Facilities	3 showers and lockers	2 showers and lockers
Diesel Storage	1,272kL diesel storage capacity	955kL diesel storage capacity
Generator Numbers	73 back-up generators	48 back-up generators
Generator Testing	197.1 total testing hours per year	132.3 total testing hours per year
EDC	\$1,582,669,210 (exc. GST).	\$1,267,188,384 (exc. GST).
Staging	The Proposal will be constructed in a single stage, but data halls will be progressively fitted out during the lifecycle of the data centre.	
Hours of Operation	24 hours / 7 days - unchanged	

3.3 UPDATED DEVELOPMENT DESCRIPTION

The proposed SSD Application seeks approval for the construction and operation of a data centre, including:

- *Minor earthworks involving cut and fill works;*
- *Site preparation works, including tree clearing;*
- *Earthworks and additional site retaining;*
- *Infrastructure comprising civil works and utilities servicing;*
- *Construction of a multi-level data centre, with the following;*
 - *Ground level loading dock, services plantrooms and car parking for 38 cars, including 2 accessible spaces;*
 - *Eight (8) data halls across four (4) storeys with an IT load of 76 MW and a maximum power consumption of 120 MW, plus rooftop plant;*
 - *Three (3) storey office/front of house building;*
 - *Five (5) storey enclosed generator gantry to rear of data centre.*
- *New Ausgrid 132 kilovolt (KV) Sub-Transmission Switching Station (STSS);*
- *A new pedestrian through-site link from Julius Avenue to Richardson Place;*
- *Complementary landscaping and offset planting;*
- *1,393m² of ancillary offices and associated amenities; and*



- *Hours of operation being on a 24 hours per day, 7 days per week basis.*

3.4 CLARIFICATION TO THE EIS

Clarifications to the following information presented in the EIS are provided and discussed in detail in **Section 6.2**.

3.4.1 Operational Changes

To ensure an improved overall developmental outcome, it was identified that a reduction in the capacity of the data centre was required to respond to additional issues raised and are detailed throughout this request. Additionally, the adoption of air-cooled chillers reduces the demand for water on the subject site down to the facilitation of staff amenities only (i.e. bathrooms, kitchen and the like), reducing consumption by approximately 2,250 million litres per year, from 2,258 million litres per year to 7.2 million litres per year (99.7% reduction). Further, there is a reduction in sewer outflow from 733,000 litres per day to 15,874 litres per day (98% reduction).

3.4.2 Built Form

A reduction in capacity and the change to cooling methods allows the deletion of the former Level 6 chiller and deletion of the former basement level (as water storage tanks are no longer required), allowing a reduction to four (4) storeys. Basement car parking has been relocated to the ground level adjacent to the proposed loading dock.

Additional, changes to the proposed building have been undertaken to better integrate with the Julius Avenue frontage of the subject site. Additionally, a revised façade materiality has been provided to negate previous reflectivity concerns. Further, setbacks to the north, east and west elevations have been increased to reduce the prominence of the building from Julius Avenue.



Figure 3: Former Building Elevation (Viewed from Julius Avenue) (Greenbox Architects, 2025)





Figure 4: Amended Building Elevation (Viewed from Julius Avenue) (Greenbox Architects, 2025)

3.4.3 Tree Removal

The amended development necessitates the removal of 334 trees, the vast majority of which are not mature trees and simply regrowth on the existing site cut footprint. The original proposal intended to remove 509 trees hence the amended development proposal will result in an improved outcome, with 175 fewer trees requiring removal.

The classification groups for the trees proposed for removal, as designated by the project arborist, are summarised as follows::

- Two (2) are of a 'priority for retention' value;
- Twenty nine (20) are of a 'consider for retention' value;
- Two hundred and eighty seven (287) are of a 'consider for removal' value; and
- Sixteen (16) are of a 'priority for removal' value.

Approximately 220 of the 334 trees to be removed are regrowth trees less than 20 years old located on the existing site cut.





Figure 5: Amended Tree Removal Retention Plan (Arcadia, 2025)



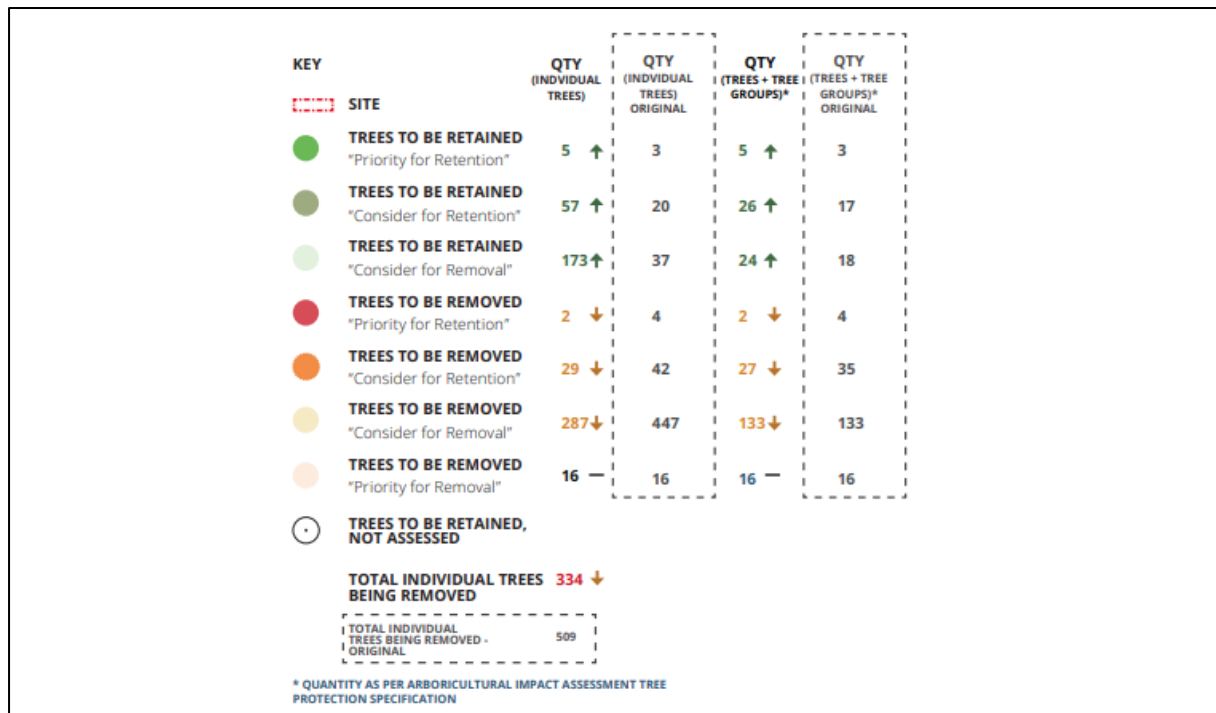


Figure 6: Tree Removal Schedule (Arcadia, 2025)

The Landscape Report enclosed at **Appendix DD12** of this Amendment Report includes a full assessment schedule of all existing trees within the subject site.

3.4.4 Vehicular and Pedestrian Access

The proposed development now removes the previous extension of Richardson Place. This was proposed to extend from the existing cul-de-sac to an additional juncture point creating an additional connection to Julius Avenue. This ensures on-site vegetation is beneficially retained and does not preclude such a connection being constructed in future, however, justifies its current removal from the scope of works. The relocation of the STSS also negates the present requirement for this road due to its relocation to the west of the building.

The previously proposed walking track on the western side of the subject site has been removed from the proposed development. This amendment is to avoid disturbance of existing bushland through on-site retention rather than the provision of an additional pedestrian connection. Notwithstanding, the pedestrian link path to the east of the subject site will be maintained.





Figure 7: Former Location of Western Walking Track (Arcadia, 2025)



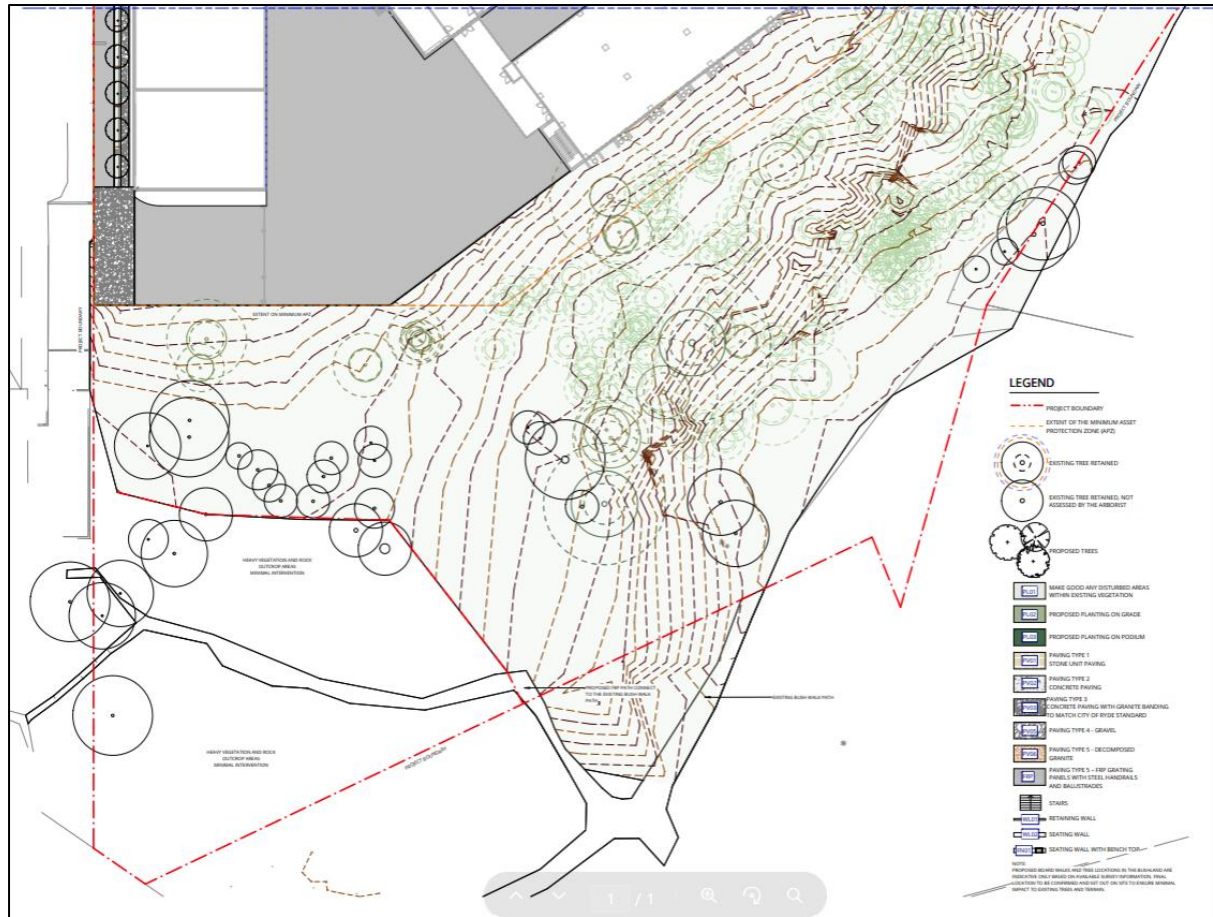


Figure 8: Proposed Removal of Western Walking Track (Arcadia, 2025)

This element is further discussed in **Section 6.2.5**.

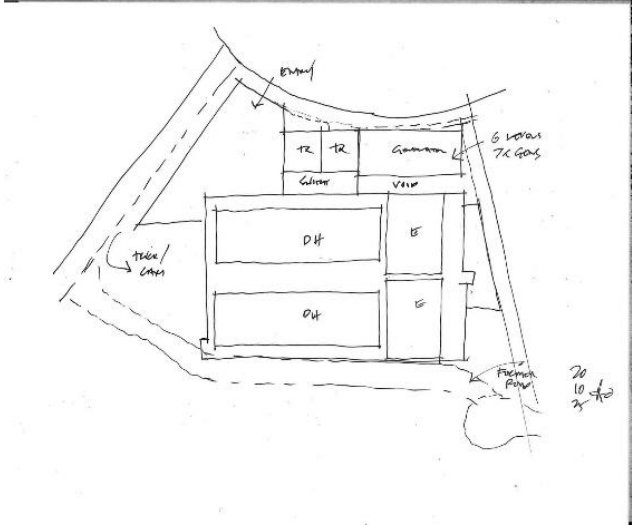
3.4.5 Design Options Analysis

In response to matters raised throughout the assessment of this development, several architectural design options were explored prior to the amended design. This procedure was undertaken to ensure design options were systematically trialled and evaluated alongside identified matters of concern.

Based on this structured analysis, a preferred option was selected, with minimisation of vegetation removal being considered the highest priority. Coupling the minimisation of vegetation loss with the retained utilisation of operational and the design functionality has resulted in the design presented to DPHI through this amendment. A timeline of the options analysis undertaken is provided within **TABLE 8** below.



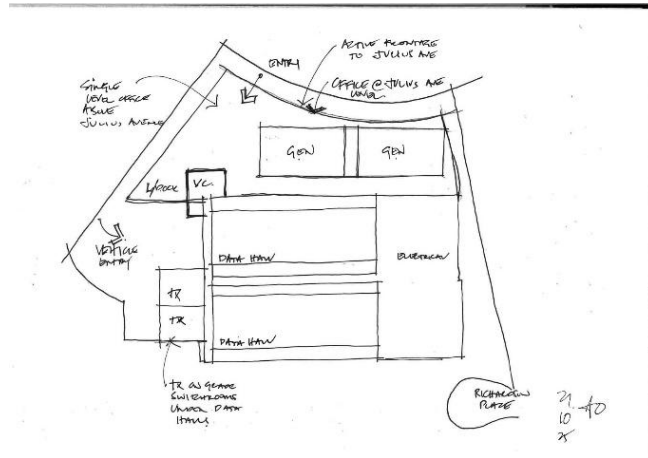
TABLE 8. ARCHITECTURAL OPTIONS ANALYSIS

Design Stage	Comment
Initial Design (SSDA Submission) – as per EIS Submission (Figure 3)	DPHI cited the following concerns regarding the development: <ul style="list-style-type: none"> ▪ Height exceedance beyond 45m prescribed under RLEP2014; ▪ Bulk and scale of the project; ▪ Materiality and the visual impact; ▪ STSS location; ▪ Parking losses as a result of the extension of Richardson Place from the existing cul-de-sac; and ▪ Development footprint and perceived impact to neighbours and biodiversity.
Relocation of generators and transformers to the north. 	Advantages: <ul style="list-style-type: none"> ▪ Removal of generators from southern elevation. ▪ Transformer located closer to incoming feeds on Julius Avenue. Disadvantages: <ul style="list-style-type: none"> ▪ Lack of activated frontage to Julius Avenue with transformers and generators facing Julius Avenue. ▪ Generators not aligned with data hall levels. ▪ Inability to configure functional air-cooling arrangement with generators on the North side due to heights and prevailing wind direction. ▪ Clash with generator air flow and roof mounted mechanical plant. ▪ Increased bulk and scale when viewed from Julius Avenue. ▪ Unacceptable acoustic impacts to residential receivers to north-west with generators located on north side. ▪ Inferior streetscape vista from Julius Avenue with generators to north. ▪ Inability to configure materials handling access for key infrastructure elements. ▪ Inferior exhaust dispersion profile with generators to north.



AMENDMENT REPORT

Generators to the north, transformers to the west adjacent to the data halls



Advantages:

- Active street frontage podium to Julius Avenue
- Removes Generators from Southern elevation.

Disadvantages:

- Inability to configure functional air-cooling arrangement with generators on the North side due to heights and prevailing wind direction.
- Complexity and limitations for plant installation to roof level.
- Increased bulk and scale when viewed from Julius Avenue.
- Unacceptable acoustic impacts to residential receivers to north-west with generators located on the north.
- Inferior streetscape vista from Julius Avenue with generators to north.
- Dock configuration unable to accommodate minimum vehicle swept paths.
- Inability to configure materials handling access for key infrastructure elements.
- Inferior exhaust dispersion profile with generators to north.



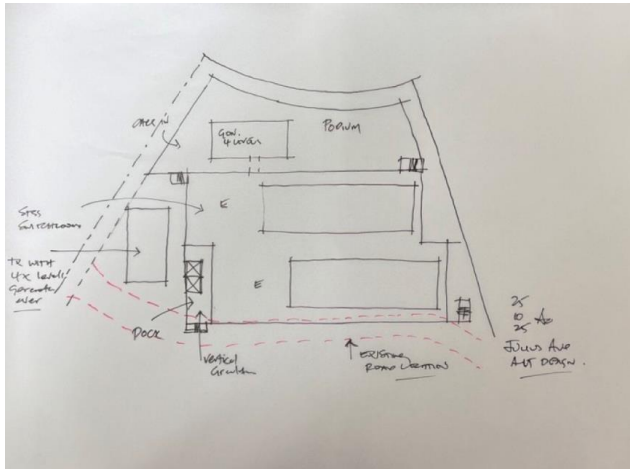
AMENDMENT REPORT

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

Generators to the north, transformers to the west, data halls staggered.



Advantages:

- Active street frontage to Julius Avenue

Disadvantages:

- Separation of Generators gantries engineering issues
- Generator over TX structural and installation challenges
- Complexity and limitations for plant installation to roof level may still require Richardson Place extension.
- Unacceptable acoustic impacts to residential receivers to north-west with generators located on North side.
- Dock configuration unable to accommodate minimum vehicle swept paths.

Proposed Amended Design (as now proposed within Appendix DD2)

- Reduction in overall building footprint;
- Active frontage provided to strengthen street engagement;
- Functional building system;
- Increased retention of vegetation to the south of the subject site;
- Height of building within limits prescribed by RLEP2014, negating the requirement of a Clause 4.6 Variation Request;
- Reduction in facility capacity from 115.2MW to 76MW;
- Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers to negate previous water demands;
- A reduction in storeys from 6 storeys to 4 storeys. Car parking is now to be located on the ground level, rather than the basement level. The building has also provided increases to setbacks and street activation to Julius Avenue;
- The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW;
- The Richardson Place connection through the site has been removed further reducing



	<p>vegetation clearing on the subject site, with access to loading areas and STSS proposed from Julius Avenue only.</p> <ul style="list-style-type: none">▪ Removal of western pedestrian connection to the Great North Walk.▪ Reduction in GFA to 16,647m².
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3.5 AVOIDANCE OF EXISTING VEGETATION AND LANDSCAPED ZONE ENCROACHMENT

The redesign of the proposal has been carried out, noting the need to achieve consistency with the Macquarie Park Design Guide where practical, and to ensure the operational and functional performance of the data centre building.

A substantial reduction in external roads, infrastructure and building area is proposed, with a decrease in FSR from 0.91:1 to 0.58:1, resulting in a materially reduced encroachment into the Landscape Setback Area, pursuant to Figure 37b of the Macquarie Park Design Guide.

The most substantial improvements are attributed to reducing the size of the electrical infrastructure and relocating it within the main building zone, along with removing the original link road from the south side of the building. The remaining encroachment into the bushland area is primarily due to the increased setbacks introduced to Julius Avenue, as well as eastern and western boundaries, which moved the data centre building to the south. The figures below show the original scheme and the now updated scheme in terms of the landscaped setback encroachment.





Figure 9: Original Building Footprint (Greenbox, 2026)

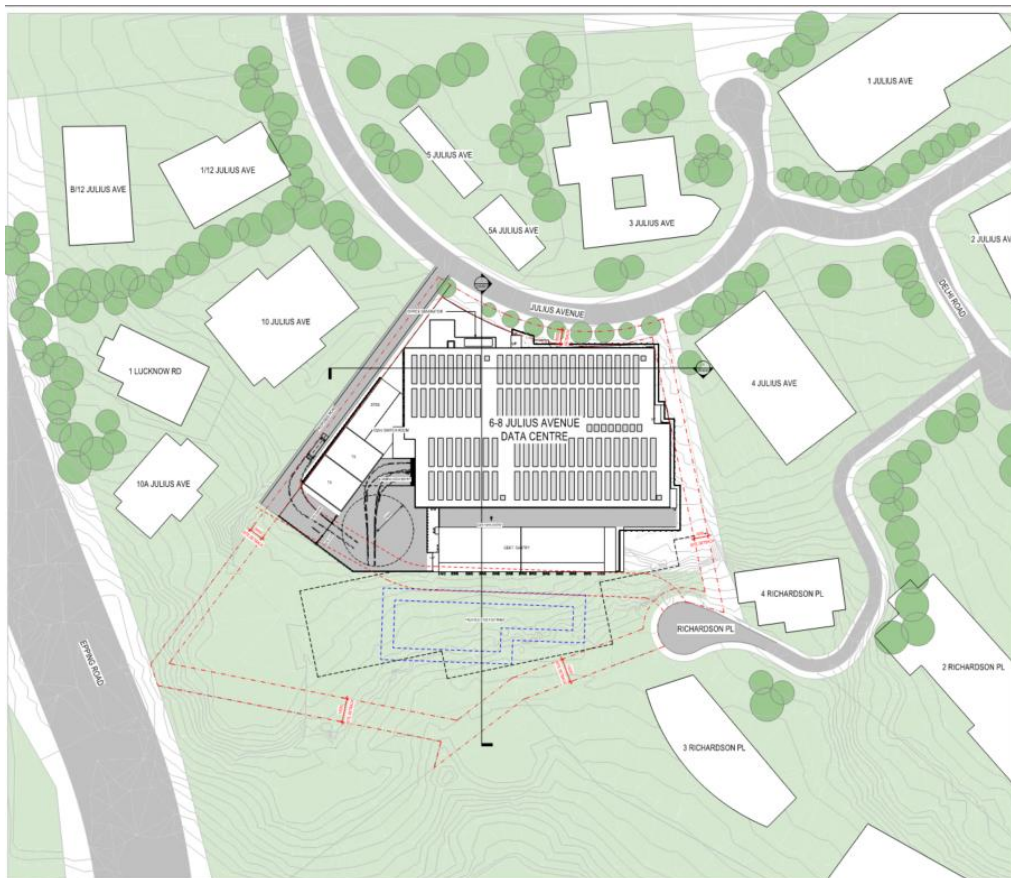


Figure 10: Proposed Building Footprint (Greenbox, 2026)



The following matters were considered in the redesign and provide the basis of justification of the proposal (as amended).

(a) Functional and Operational Necessity

The generator building (gantry) is an essential piece of critical infrastructure for the data centre operation. Multiple configurations have been considered for its placement relative to the main data centre, as outlined in **Section 6.2.2**. The only viable location based on site and design constraints is to the south of the main data centre building, and it must have an air gap from the main building to function as required. Its location has been selected based on several reasons outlined below.

- Physical separation between the data centre building and generator building is required to allow sufficient airflow and to avoid recirculation to the rooftop chillers, as well as assisting with dispersion of generator exhaust flues.
- Computational fluid dynamics analysis has been undertaken which has identified that reduction in generator and building separation leads to increases in intake pressure build up, starving generator intakes. The generators and chillers are unable required if the gap is reduced.
- A taller building form to offset plant area, as queried by DPHI, is not feasible due to the amount of rooftop areas required to sustain the minimum number of rooftop chillers required for cooling of the facility. The facility relies on the rooftop area and any decrease in area further reduces the facility capacity hence increasing the storeys is not considered quantifiable. As such, the building footprint cannot reduce, nor can the gantry be in another location due to required separations.
- The development includes the provision of a 10m Asset Protection Zone (APZ) around the generator gantry to the south, as identified in Appendix 1 of the Bushfire Assessment (**Appendix DD30**). The proposed development implemented a performance solution to reduce the APZ to the minimum viable dimension – the standard APZ applicable was 57m and would have required extensive tree thinning in this zone and thus the 10m APZ as proposed dramatically reduces the impacted area of bushland. Notwithstanding, the performance solution ensures an appropriate separation between buildings in a fire spread event. Planting remains proposed in these areas, however species have been selected that avoid canopy contact.

(b) Avoidance of Sensitive Areas

The majority of land within the proposed development footprint is of the VZ1 3596_Regrowth category, which is of lesser value, when compared to the VZ2 3952_ModGood land to the south, pursuant to Figure 6 of the BDAR reproduced below (**Appendix DD15**).



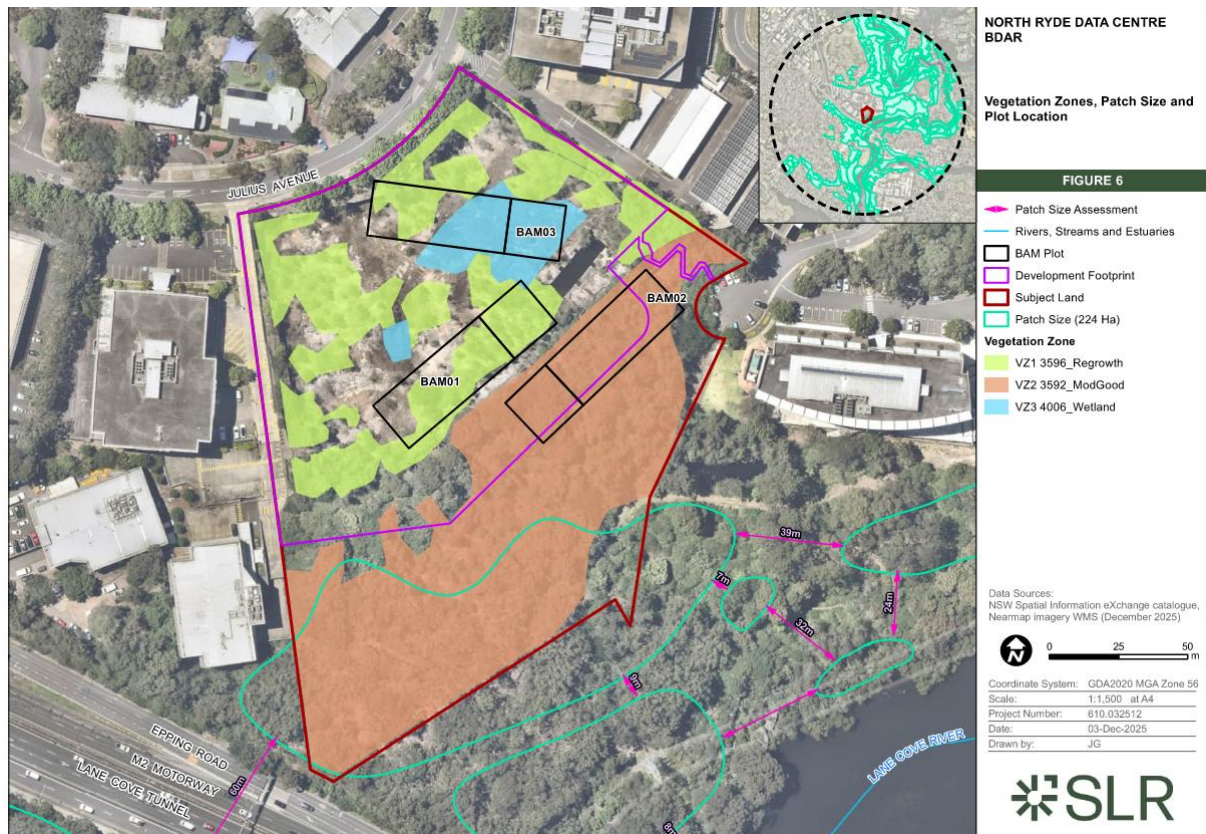


Figure 11: Vegetation Mapping from BDAR (SLR, 2025)

The re-design is considered to provide a better outcome in terms of avoidance as:

- The majority of impacted trees have been classified by the arborist as 'consider for removal' or 'priority for removal'. This accounts for 303 of the 334 trees identified for removal, or 90%, hence the encroachment largely avoids impacting the higher value species in the southern bushland zone.
- Approximately 81% of the existing bushland zone would be retained, compared with 63% under the prior proposal (refer to Part 5 of the Landscape Report (**Appendix DD12**)).
-

(c) Minimised Built Form Presence

The data centre building has been designed to:

- Be sited towards Julius Avenue, while remaining low within the subject site topography within the existing site cut, reducing visibility from the public domain.
- Avoid introducing a built form that competes with the intended landscaped character of the Macquarie Park employment corridor.

Fundamentally, the built form proposed in its amended form achieves a footprint that negates any height variation under RLEP 2014 and thus maintains compliance with the development standard. The resultant built form that achieves a compliant height is therefore considered appropriate within the streetscape setting as aforementioned on environmental planning grounds.

Overall, the natural bushland setting is maintained, that co-exists with the Macquarie Park suburban business park character when viewed from various perspectives. The proposal in terms of the original building height and the amended scheme is shown below, utilising Viewpoint 6 for comparison. This reflects the consistency with surrounding development in terms of bulk and scale. Refer to **Appendix DD7** for the full Visual Impact Assessment and corresponding report.





Figure 12: Viewpoint 6 as originally submitted (Geoscapes, 2025)



Figure 13: Viewpoint 6 of amended scheme (Geoscapes, 2025)



(d) Proportionality and Net Site Landscape Performance

The encroachment represents only a minor proportion of the total landscape setback area, and when viewed in the context of:

- The total site area; and
- The landscape zone area.

The proposed development in its amended form is sympathetic to the required building setbacks of 6m to Julius Avenue, and the south-western and north-eastern portions of the subject site, in alignment with Provision 1 (b) of Part 5.2 of the Macquarie Park Design Guide.

The proposed development achieves a deep soil area of 49.8% (refer to the Landscape Report within Part 3 of **Appendix DD12**) and showcases a commitment from the applicant towards retaining and enhance the landscaping to the site.

(e) Macquarie Park Design Guide Objectives

The development has been amended having further consideration to the Macquarie Park Design Guide, particularly to Parts 5.2 and 6.5, as detailed below.

TABLE 9: 5.2-BUILDING LINE SETBACKS	
Objective	Response
a) Enhance the character of existing streets and create new streets which contribute to the character and identity of the Precinct.	<p>The development enhances the character of Julius Avenue through providing improved access points to the subject site, and provision of upgraded landscaping and lighting.</p> <p>All mature trees to Julius Avenue are retained, with additional low level planting and a new landscaped pedestrian walkway connection to the East side of the site, connecting Julius Avenue with the Richardson Place cul-de-sac. The extension of Richardson Place has been removed from the scope of development as identified in Section 3.4.4.</p> <p>The existing private entry road on the west side of the site is to be enhanced with low level planting as shown on the Landscape Drawings (Appendix DD11).</p> <p>Building orientation, setbacks and frontage treatments including activation contribute to a coherent and legible streetscape and avoid visually dominant outcomes.</p> <p>Where new internal accessways and pedestrian connections are provided, they are designed as landscaped integrated movement corridors that support permeability, visual interest and a consistent precinct character.</p>
b) Retain and reinforce the existing character of green setbacks with mature planting.	<p>The reduction in the extent of the data centre building has enabled the retention of the majority of existing green setbacks, and the limited encroachment does not materially diminish the established character of mature planting within this area. The remaining buffer continues to provide an effective landscape setting, ensuring</p>



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	<p>that the existing green infrastructure and sense of visual amenity are maintained.</p> <p>Existing landscaped setbacks are maintained, and new planting is incorporated to strengthen the visual prominence of green buffers between the subject site and the public realm.</p>
<p>c) Ensure views to the sky and views between buildings from the public realm, including between buildings on adjoining lots.</p>	<p>A new pedestrian through-site link has been proposed in alignment with Section 4.2 of the Macquarie Park Design Guide.</p> <p>This new connection from Julius Avenue to the Richardson Place cul-de-sac provides a visual corridor down to the bushland zone along with opening views for pedestrians as they travel south from Julius Avenue. This is reflected within Part 3 of the Landscape Report (Appendix DD12).</p> <p>The building footprint is arranged to avoid continuous street wall outcomes and to provide visual breaks between built elements, consistent with the established industrial and employment character of the locality.</p> <p>Setbacks from site boundaries, internal separation between building elements and landscaped areas ensure that views between buildings on adjoining lots are retained, particularly along Julius Avenue and surrounding public domain interfaces.</p>
<p>d) Ensure appropriate separation between buildings to protect residential amenity and privacy.</p>	<p>The building is appropriately separated from current residential developments. Future residential amenity is maintained by virtue of no direct interface.</p> <p>All design and acoustic studies/treatments have contemplated future development to the precinct in line with the current zoning, accordingly undertaken within the NVIA (refer to Appendix DD18).</p>
<p>e) Ensure appropriate amenity for the public domain including wind conditions, solar access and protection from weather</p>	<p>A Wind Study has been prepared by MEL Consultants (Appendix DD35), which determines through Section 3.1 that the proposed development would not catalyse adverse wind effects in the public domain.</p> <p>Solar access and weather protection is provided through a blend of open of open space and shaded areas, particularly along Julius Avenue and within the through-site link proposed.</p> <p>It is also noted that the subject site does not contain mapped solar and open space network provisions under Part 4.3 of the Macquarie Park Design Guide.</p>



TABLE 10: 6.5 CANOPY COVERAGE AND BIODIVERSITY

Objective	Response
<p>a) Recreate environmental values across the precinct consistent with Country, including native vegetation, water ways, water bodies and wetlands.</p>	<p>The development retains environmental values to the south to attain a landscaped buffer towards the Great North Walk to the south, in consideration of the NSW Government's 'Connecting with Country' publication (as identified within Part 1 of the Landscape Report within Appendix DD12).</p> <p>The proposal includes the use of locally appropriate native vegetation within landscaped setbacks and buffer areas to reinforce ecological character and support urban biodiversity.</p> <p>Water sensitive urban design measures are integrated into the site to manage stormwater in a manner that reflects natural hydrological processes (per the Water Management Plan within Appendix DD21) through the provision of level spreaders.</p>
<p>b) Provide opportunities to increase biodiversity resilience to climate change and natural hazards.</p>	<p>In addition to retention of on-site vegetation, consideration was undertaken regarding species selected through on-site landscaping (as identified in Part 3 of the Landscape Report within Appendix DD12).</p> <p>A diverse mix of native planting is proposed throughout the subject site to reduce reliance on irrigation and enhance biodiversity.</p>
<p>c) Maximise the future mature tree canopy and vegetation coverage across the Precinct, providing a green and healthy environment that supports active lifestyles.</p>	<p>The proposed development has been designed to maximise future mature tree canopy and vegetation coverage across the precinct through a comprehensive landscape strategy.</p> <p>The proposal incorporates generous landscaped setbacks, deep soil zones and extensive tree planting with species selected to achieve substantial canopy cover at maturity, reinforcing the green character of Julius Avenue and the broader precinct. (Refer to the Amended Viewpoint 6 of the Visual Impact Assessment within Appendix DD7).</p>
<p>d) Ensure no net loss of tree canopy coverage within development lots.</p>	<p>The development responds to this objective through the increase in tree canopy of 6.36% (refer to Part 3 of Appendix DD12).</p>
<p>e) Deliver a renewal precinct that transforms the existing poor urban conditions on site to an ecologically diverse, sustainable, and dense planted urban canopy that connects learning environments and provides a level of habitat connectivity that is currently absent.</p>	<p>The proposal replaces graded landscape conditions with a comprehensive landscape framework incorporating extensive native planting, mature tree canopy and integrated open space.</p> <p>The landscape strategy includes the removal of weeds and introduced species across the site, with replacement planting focused on locally appropriate native species to improve ecological function and resilience.</p> <p>The development has prioritised the siting of buildings in areas of previously cleared vegetation.</p>



	The development’s landscape design establishes a continuous green network extending from Julius Avenue through the site to the rear landscape buffer adjoining the national park. This in turn strengthens links between the public domain, alongside on-site signage (as identified within Part 3 of the Landscape Report within Appendix DD12).
f) Enable greater consultation in the future to align traditional knowledge and cultural views of biodiversity with those responsible for developing the future ecological opportunities for enhancement.	The development recognises the importance of incorporating traditional knowledge and cultural perspectives into future biodiversity and landscape outcomes. The proposal enables ongoing consultation with Aboriginal stakeholders and relevant knowledge holders during detailed design.
g) Provide habitat connectivity for mobile species between key local and regional green and blue spaces.	No threatened species were recorded through an on-site survey. Additionally, no BioNet records are recorded in the area of the development footprint, pursuant to Figure 6 of the BDAR (Appendix DD15). The provision of landscaping (inclusive of tree planting) ensures continuous links of landscaping between the northern and southern bounds of the site.
h) Establish a biophilic environment that provides a material connection to natural systems.	The development contains biophilic elements through the integration of additional landscaping along Julius Avenue and the through-site links to the Great North Walk.
g) Achieve a Net Positive Impact on biodiversity in every development.	Pursuant to Section 11 of the BDAR (Appendix DD15), the development requires 14 ecosystem credits and 75 species credits of which have been assessed through a Biodiversity Credit Report (Appendix F of Appendix DD15). A long-term landscape management and maintenance regime will be implemented to ensure the ongoing establishment, health and performance of vegetation and habitat values over time.

(f) Objectives of the Zone

The development has considered Clause 2.3 of RLEP2014, particularly regarding alignment with the objectives of the E3 Productivity Support zone.

TABLE 11: E3 PRODUCTIVITY SUPPORT ZONE OBJECTIVES	
Objective	Response
To provide a range of facilities and services, light industries, warehouses and offices.	The proposed development is for a data centre which is defined as a <i>high technology industry</i> , which is a sub definition of <i>light industry</i> . The subject site is adjacent to a range of office, commercial and light industrial uses and increases the range of development in the locality.
To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres.	Data centres are permitted with consent in the E3 Productivity Support zone and therefore considered compatible with the surrounding development. The Proposal supports data



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	intensive uses and does not compete with adjoining development.
To maintain the economic viability of local and commercial centres by limiting certain retail and commercial activity.	The proposed development will encourage employment and does not interfere with the viability of the Macquarie Park Accelerated TOD Precinct by limiting retail or commercial activity.
To provide for land uses that meet the needs of the community, businesses and industries but that are not suited to locations in other employment zones.	The need for data centres is continuously growing due to rapid technological advancements in the e-commerce sector. As such, the Proposal is considered to meet the needs of businesses and industries associated with the E3 Productivity Support zone.
To provide opportunities for new and emerging light industries.	The proposed development is considered as an opportunity to provide an emerging light industry, in this case, a data centre use.
To enable other land uses that provide facilities and services to meet the day-to-day needs of workers, to sell goods of a large size, weight or quantity or to sell goods manufactured on-site.	The development does not inhibit other land uses within the E3 Productivity Support Zone being undertaken.
To promote sustainable development, including public transport and working environments.	The Proposal promotes sustainable development through the retention of existing vegetation, upgrades to existing pathways, the provision of recreational walkways to bushland, and being located within 600m of the North Ryde Metro Station.

(g) Objectives of the EP&A Act

The proposed development has assessed the objects of the EP&A Act within **Appendix B** of the Amendment Report as a mandatory consideration and as below:

TABLE 12: OBJECTS OF ACT	
Objective	Response
a) <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i>	The proposed development is sited in an existing employment area of strategic importance. The suitability of the subject site and the proposed development is considered to heed social and economic benefits for the area, without impacts to the State's natural and other resources.
b) <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	The Proposal continues to facilitate ecologically sustainable development.
c) <i>to promote the orderly and economic use and development of land,</i>	As well as fulfilling a significant role in satisfying market needs, the Proposal also demonstrates a logical redevelopment of an undeveloped Site. The Site's economic development is both logical and orderly for the following reasons: <ul style="list-style-type: none"> ▪ It delivers employment-generating opportunities in both the construction and operational phases in an area already earmarked by both State and Regional policies for employment and advancement. ▪ It provides both a new economically and ecologically sustainable development,



	<p>delivering new industry-best-practice in data centre construction.</p> <ul style="list-style-type: none"> ▪ It implements best-practice sustainability measures, to promote ecologically sustainable development. ▪ It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the site, further minimising the potential impacts of the Urban Heat Island Effect, by further reducing the Site's microclimate. <p>It improves water-quality for stormwater in accordance with the requirements of Council's engineering guidelines.</p>
d) <i>to promote the delivery and maintenance of affordable housing,</i>	Not applicable - this objective is not applicable to the proposed development, as the Proposal does not seek consent for housing.
e) <i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i>	The Site's biodiversity has been suitably assessed, including impacts to threatened and other species of native animals and plants, ecological communities and their habitats.
f) <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i>	Both environmental and Aboriginal cultural heritage has been suitably assessed, finding that: <ul style="list-style-type: none"> ▪ the Proposal does not impact on any items of historical heritage; and <p>the Site is considered to be of low archaeological potential to contain Aboriginal cultural heritage and there will be no harm to known heritage values by the proposed works. Refer to Appendix DD15 and Appendix DD26.</p>
g) <i>to promote good design and amenity of the built environment,</i>	The vision of the Proposal is to create a high-quality built form with integrated landscaping. The Proposal is considered to promote both good design and improved amenity, through the use of new-age materials and innovative contemporary design.
h) <i>to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i>	The Proposal would be implemented through best-industry practice standards and measures. The Proposal has been designed in accordance with the NCC. This incorporates into the design, all statutory and functional requirements, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.
i) <i>to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i>	The Proposal is SSD, which devolves the environmental planning and assessment of the application to NSW DPHI. Notwithstanding, the Proposal has also been informed by engagement with Council.
j) <i>to provide increased opportunity for community participation in environmental planning and assessment.</i>	Community and stakeholder engagement has been undertaken for the DA. This has included meetings and notification letters to both agencies and all potentially impacted stakeholders.



In summary, the revised location of the generator gantry satisfies the operational needs of the data centre while:

- Minimising impact on ecologically valuable areas;
- Maintaining the integrity and function of the Macquarie Park Design Guide landscape setback area by a commitment to increasing urban tree canopy cover throughout the subject site and ensuring a buffer between southern bounds of the site and the data centre building; and
- Preserving the subject site's contribution to the broader green, campus character of Neighbourhood 7.



PART 4 STATUTORY CONTEXT

4.1 RELEVANT STATUTORY REQUIREMENTS

The statutory context has not changed since the original application was submitted, and the amendments do not trigger new statutory requirement. The relevant Commonwealth, State and Local legislative requirements were considered in **Part 4** of the original EIS and is summarised in table below.

TABLE 13: STATUTORY CONTEXT													
Matter	Consideration												
Declaration of SSD	In accordance with Schedule 1 of the Planning Systems SEPP, development for data centres with a total power consumption of more than 15 MW constitutes SSD. The revised proposal continues to meet this criterion.												
Consent Authority	Department of Planning, Housing and Infrastructure												
Land use	Data centre												
Land Zoning	E3 Productivity Support												
Permissibility	Permissible with consent												
Approvals not required for SSD	<p>Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for SSD. The amended proposal does not change the below requirements. The following legislative approvals would otherwise be required if the proposal was not SSD:</p> <table border="1"> <thead> <tr> <th>Act</th> <th>Approval Required</th> </tr> </thead> <tbody> <tr> <td>A permit under section 201, 205 or 219 of the <i>Fisheries Management Act 1994</i></td> <td>No</td> </tr> <tr> <td>An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i></td> <td>No</td> </tr> <tr> <td>An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i></td> <td>No</td> </tr> <tr> <td>A bush fire safety authority under section 100B of the <i>Rural Fires Act 1997</i></td> <td>No</td> </tr> <tr> <td>A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the <i>Water Management Act 2000</i>.</td> <td>No</td> </tr> </tbody> </table>	Act	Approval Required	A permit under section 201, 205 or 219 of the <i>Fisheries Management Act 1994</i>	No	An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i>	No	An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i>	No	A bush fire safety authority under section 100B of the <i>Rural Fires Act 1997</i>	No	A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the <i>Water Management Act 2000</i> .	No
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A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the <i>Water Management Act 2000</i> .	No												
Consistent approvals	<p>Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out SSD and must be substantially consistent with the consent. The amended proposal does not change the below requirements.</p> <table border="1"> <thead> <tr> <th>Legislation</th> <th>Approval Required</th> </tr> </thead> <tbody> <tr> <td>An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i></td> <td>No</td> </tr> <tr> <td>An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i></td> <td>No</td> </tr> <tr> <td>A mining lease under the <i>Mining Act 1992</i></td> <td>No</td> </tr> </tbody> </table>	Legislation	Approval Required	An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i>	No	An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i>	No	A mining lease under the <i>Mining Act 1992</i>	No				
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A mining lease under the <i>Mining Act 1992</i>	No												



TABLE 13: STATUTORY CONTEXT			
Matter	Consideration		
	A production lease under the <i>Petroleum (Onshore) Act 1991</i>	No	
	An environment protection licence under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> (for any of the purposes referred to in section 43 of that Act)	No	
	A consent under section 138 of the <i>Roads Act 1993</i>	Yes. There will be a Section 138 Roads Act Approval for the vehicular cross-over works within the Julius Avenue reserve. However, a connection to Richardson Place is no longer proposed to be facilitated, with no such approval required for this connection.	
	A licence under the <i>Pipelines Act 1967</i>	No	
Statutory Reference	Pre-condition	Relevance / Update	Reference
<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>	Pursuant to the EPBC Act, any action that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment.	As discussed in the original EIS, the proposal was not likely to impact upon any matters of National Environmental Significance. This sentiment remains through the amended scope of development. An updated BDAR is provided, refer to Appendix DD15 .	Refer to Section 6.1.9 of EIS.
<i>Environmental Planning & Assessment Act 1979</i>	Clause 4.14 - Consultation and development consent—certain bush fire prone land Pursuant to Clause 4.14 of the Act, development consent cannot be granted for the carrying out of development for any purpose (other than a subdivision of land that could lawfully be used for residential or rural residential purposes or development for a special fire protection purpose) on bush fire prone land (being land for	An amended Bushfire Assessment has been provided to address the requirements of this clause. Refer to Appendix DD30 .	Refer to Section 6.1.22 of EIS.



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>the time being recorded as bush fire prone land on a relevant map certified under section 10.3(2) unless the consent authority—</p> <p>(a) is satisfied that the development conforms to the specifications and requirements of the version (as prescribed by the regulations) of the document entitled <i>Planning for Bush Fire Protection</i> prepared by the NSW Rural Fire Service in co-operation with the Department (or, if another document is prescribed by the regulations for the purposes of this paragraph, that document) that are relevant to the development (the relevant specifications and requirements), or</p> <p>(b) has been provided with a certificate by a person who is recognised by the NSW Rural Fire Service as a qualified consultant in bush fire risk assessment stating that the development conforms to the relevant specifications and requirements.</p>		
<p>Environmental Planning & Assessment Regulation 2021</p> <p>Part 8- Infrastructure and environmental impact assessment</p>	<p>35BA Embodied emissions for non-residential development under Sustainable Buildings SEPP</p> <p>Clause 35A prescribes the following:</p> <p>(1) A development application for non-residential development under State Environmental Planning Policy (Sustainable Buildings) 2022 must—</p> <p>(a) disclose the amount of embodied emissions attributable to the development, and</p> <p>(b) describe the use of low emissions construction technologies in the development.</p> <p>Clause 35C - Net zero statement for non-residential development</p>	<p>An Embodied Emissions Materials Form has been provided to address the requirements of this clause.</p> <p>An Embodied Emissions Materials</p>	<p>Refer to Appendix DD14.</p> <p>Refer to Appendix DD14.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>under Sustainable Buildings SEPP</p> <p>Clause 35C prescribes the following:</p> <p>(2) <i>The development application must include evidence that the development—</i></p> <p>(a) <i>will not use on-site fossil fuels after the occupation and use of the development commence, or</i></p> <p>(b) <i>incorporates the infrastructure, or space for the infrastructure, necessary for the development to not use on-site fossil fuels after 1 January 2035.</i></p> <p><i>Note— Infrastructure includes plant, equipment and ventilation.</i></p> <p>(3) <i>The development application must include details of the following—</i></p> <p>(a) <i>any renewable energy generation and storage infrastructure forming part of the development,</i></p> <p>(b) <i>passive and technical design features that minimise energy consumption by users of the development.</i></p> <p>(4) <i>The development application must include the following information if available—</i></p> <p>(a) <i>the estimated annual energy consumption for the building in kilowatt hours per square metre of floor area,</i></p> <p>(b) <i>the estimated amount of emissions relating to energy use in the building, including direct and indirect emissions.</i></p>	<p>Form has been provided to address the requirements of this clause.</p>	
	<p>Section 192 - Content of environmental impact statement</p> <p>Section 192(f) prescribes that an environmental impact statement must contain the following—</p>	<p>An amended Ecologically Sustainable Development Report has been provided that addresses the principles of ESD as</p>	<p>Refer to Appendix DD13.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<i>(f) the reasons justifying the carrying out of the development, activity or infrastructure, considering biophysical, economic and social factors, including the principles of ecologically sustainable development set out in section 193.</i>	set out in Section 193 of the Regulation.	
<p>National Parks and Wildlife Act 1974 <i>Part 6 Aboriginal objects and Aboriginal places</i></p>	<p>Part 6 of the NPW Act prescribes that the Secretary shall be the authority for the protection of Aboriginal objects and Aboriginal places in New South Wales.</p> <p>The Guide to Investigating and Reporting on Aboriginal Heritage (OEH 2011) provides guidance on the assessment of Aboriginal heritage.</p>	An amended ACHAR has been provided to address the requirements of this clause.	Refer to Appendix DD26 .
<p>NSW Biodiversity Conservation Act 2016 <i>Part 7 - Biodiversity assessment and approvals under Planning Act</i></p>	<p>Clause 7.9 Biodiversity assessment for State significant development or infrastructure</p> <p>Pursuant to Clause 7.9 of the Act, any SSD applications for development consent must be accompanied by a BDAR.</p>	An amended BDAR has been prepared to address the requirements of this clause.	Refer to Appendix DD15 .
<p>Protection of the Environment Operations Act 1997</p>	<p>Schedule 1, Clause 9(1) - Petroleum products storage</p> <p>Pursuant to Clause 9 of Schedule 1 of the Act, <i>'petroleum products storage', which would include diesel fuel storage, is a Scheduled Activity.</i></p> <p><i>The relevant threshold prescribed by Clause 9 of Schedule 1 for chemical storage is 2,000t.</i></p> <p>Schedule 1, Clause 17 - Electricity Generation</p> <p>Pursuant to Clause 17 of Schedule 1 of the Act, <i>'electricity generating works, which would include the capacity to generate more than 30 megawatts of electrical power is a Scheduled Activity.</i></p> <p><i>However, this clause does not apply to the generation of electricity by means of electricity plant that is emergency stand-by plant operating for less than 200 hours per year.</i></p>	<p>The amended development provides storage for 955kL which does not exceed the 2000t threshold as discussed in the Preliminary Risk Screening. Therefore, an EPL is not required.</p> <p>Details of all emergency back-up generators has been provided to confirm that the electricity generation will not require an EPL.</p>	<p>Refer to Appendix DD23.</p> <p>Refer to Appendix DD16.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
<p>State Environmental Planning Policy (Biodiversity and Conservation) 2021</p> <p>Chapter 2: Vegetation in Non-Rural Areas</p>	<p>Part 2.2 Clearing vegetation in non-rural areas</p> <p>Pursuant to Part 2.2 of the SEPP, a person must not clear vegetation in a non-rural area of the State without the authority conferred by a permit granted by the council under that Part..</p>	<p>An updated BDAR has been provided. This has determined that there is no native vegetation within the subject site.</p>	<p>Refer to Appendix DD15.</p>
<p>State Environmental Planning Policy (Resilience and Hazards) 2021</p> <p>Chapter 3 - Hazardous of offensive development</p>	<p>Clause 3.11 - Preparation of preliminary hazard analysis</p> <p>Pursuant to Clause 3.11 of the SEPP, a person who proposes to make a development application to carry out development for the purposes of a potentially hazardous industry must prepare a preliminary hazard analysis in accordance with the current circulars or guidelines published by the DPE and submit the analysis with the development application.</p>	<p>An amended Preliminary Risk Screening has been provided in accordance with <i>Applying SEPP 33</i> which confirms that the Proposal is not potentially hazardous or potentially offensive industry.</p>	<p>Refer to Appendix DD23.</p>
<p>State Environmental Planning Policy (Resilience and Hazards) 2021</p> <p>Chapter 4 - Remediation of Land</p>	<p>Clause 4.6 - Contamination and remediation to be considered in determining development application</p> <p>Pursuant to Clause 4.6 of the SEPP, the consent authority must not grant consent unless:</p> <p>(a) <i>it has considered whether the land is contaminated, and</i></p> <p>(b) <i>if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and</i></p> <p><i>if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.</i></p>	<p>A preliminary Site Investigation been carried out for the Site which has determined that the Site is suitable for the Proposal in its current state.</p>	<p>Refer to Appendix DD24.</p>
<p>State Environmental Planning Policy</p>	<p>Clause 2.122 - Traffic-generating development</p>	<p>It is noted that the Proposal is traffic-generating</p>	<p>Refer to Appendix DD8.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
<p>(Transport and Infrastructure) 2021 Chapter 2 - Infrastructure</p>	<p>Pursuant to Clause 2.122 and Schedule 3 of the SEPP, the Proposal is for industries and the relevant size or capacity is less than 20,000m².</p>	<p>development. A Transport and Accessibility Impact Assessment has been prepared in support of the Proposal which addresses the accessibility of the Site and potential traffic safety, road congestion and parking implications of the Proposal.</p>	
<p>State Environmental Planning Policy (Sustainable Buildings) 2022</p>	<p>Development consent for non-residential development:</p> <p>Pursuant to Chapter 3, Clause 3.2 of the SEPP:</p> <p><i>(1) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—</i></p> <ul style="list-style-type: none"> <i>(a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,</i> <i>(b) a reduction in peak demand for electricity, including through the use of energy efficient technology,</i> <i>(c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,</i> <i>(d) the generation and storage of renewable energy,</i> <i>(e) the metering and monitoring of energy consumption,</i> <i>(f) the minimisation of the consumption of potable water.</i> 	<p>An ESD Report has been provided to demonstrate compliance with this Clause.</p> <p>A NABERS Embodied Emissions Materials Form has been provided to quantify the embodied emissions attributable to the development.</p>	<p>Refer to Appendix DD13 and Appendix DD14 respectively.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p><i>Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</i></p>		
<p>Ryde Local Environmental Plan 2014</p>	<p>Clause 4.3 - Maximum Height of Building</p> <p>Pursuant to Clause 4.3(2) of the LEP, the height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.</p> <p>The Site is subject to a maximum building height development standard of 30m.</p>	<p>The amended development has a maximum building height of 40m and therefore would not ordinarily comply with the development standard.</p> <p>Refer to Clause 7.7 of RLEP 2014 for the relevant incentive building height development standard.</p>	<p>Refer to responses to Clause 4.6 and Clause 7.7 of RLEP2014 below.</p>
	<p>Clause 4.4 - Floor Space Ratio</p> <p>Pursuant to Clause 4.4(2) of the LEP, the maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.</p> <p>The Site is subject to a maximum FSR development standard of 1:1, measured in accordance with Clause 4.5 of the LEP below.</p>	<p>The amended development has an FSR of 0.58:1 and therefore complies with the maximum FSR development standard, measured in accordance with Clause 4.5 of the LEP below.</p>	<p>Refer to Appendix DD2.</p>
	<p>Clause 4.5 - Calculation of floor space ratio and site area</p> <p>The calculation of floor space ratio and site area must be calculated in accordance with Clause 4.5 of the LEP.</p>	<p>The calculation of floor space ratio and site area has been measured across the Site in accordance with Clause 4.5 of the LEP.</p>	<p>Refer to Appendix DD2.</p>
	<p>Clause 4.6 - Exceptions to development standards</p> <p>Pursuant to Clause 4.6(3) of the LEP, development consent must not be granted to development that contravenes a development standard unless the consent authority is satisfied the applicant has demonstrated that—</p> <p>(a) compliance with the development standard is</p>	<p>A prior written request pursuant to Clause 4.6 of RLEP 2014 was prepared. However, as the amended development no longer exceeds the height development standard (45m pursuant to Clause 7.7</p>	<p>N/A</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>unreasonable or unnecessary in the circumstances, and</p> <p><i>(b) there are sufficient environmental planning grounds to justify the contravention of the development standard.</i></p>	<p>below), this is no longer required.</p>	
	<p>Clause 5.21 - Flood Planning:</p> <p>Pursuant to Clause 5.21 of the LEP, development consent must not be granted unless the consent authority is satisfied the development –</p> <p><i>(a) is compatible with the flood function and behaviour on the land, and</i></p> <p><i>(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and</i></p> <p><i>(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i></p> <p><i>(d) incorporates appropriate measures to manage risk to life in the event of a flood, and</i></p> <p><i>(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.</i></p>	<p>An amended Flood Impact and Risk Assessment has been provided that has considered the compatibility of the Proposal with the flood function and behaviour on the land.</p> <p>The Proposal is considered to be consistent with Clause 5.21 of RLEP 2014.</p>	<p>Refer to Appendix DD22.</p>
	<p>Clause 6.1 - Acid sulfate soils</p>	<p>The Site is identified on the Acid Sulfate Soils Map as containing Class 5 acid sulfate soils.</p> <p>A Geotechnical Assessment is provided which</p>	<p>Refer to Appendix DD19.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>Pursuant to Clause 6.1 of the LEP, <i>development consent must not be granted for the carrying out of works unless an acid sulfate soils management plan has been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.</i></p>	<p>addresses the requirements of this clause.</p>	
	<p>Clause 6.2 - Earthworks</p> <p>Pursuant to Clause 6.2 of the LEP, in deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters—</p> <ul style="list-style-type: none"> <i>(i) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,</i> <i>(ii) the effect of the development on the likely future use or redevelopment of the land,</i> <i>(iii) the quality of the fill or the soil to be excavated, or both,</i> <i>(iv) the effect of the development on the existing and likely amenity of adjoining properties,</i> <i>(v) the source of any fill material and the destination of any excavated material,</i> <i>(vi) the likelihood of disturbing relics,</i> <i>(vii) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,</i> <p><i>any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i></p>	<p>Earthworks are proposed as part of the Proposal, requiring consideration of Clause 6.1A of the LEP.</p> <p>A Geotechnical Assessment is provided which addresses the requirements of this clause.</p>	<p>Refer to Appendix DD19.</p>
	<p>Clause 6.3 - Stormwater Management</p>	<p>A Civil Engineering Report (inclusive of a water management</p>	<p>Refer to Appendix DD21.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>Pursuant to Clause 6.4(3) of the LEP, development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development—</p> <p><i>(a) is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and</i></p> <p><i>(b) includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and</i></p> <p><i>(c) avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact.</i></p>	<p>plan) is provided which addresses the requirements of this clause.</p>	
	<p>Clause 6.6 - Environmental sustainability</p> <p>Pursuant to Clause 6.6(2) of the LEP, development consent must not be granted to development on land in an employment zone if the development is 1,500 square metres in gross floor area or greater unless the consent authority is satisfied that the development has regard to the following—</p> <p><i>(a) water demand reduction, including water efficiency, water recycling and minimisation of potable water usage,</i></p> <p><i>(b) energy demand reduction, including energy generation, use of renewable energy and reduced reliance on mains power,</i></p> <p><i>(c) indoor environmental quality, including daylight provision, glare control, increased outside air rates, thermal comfort,</i></p>	<p>An amended ESD Report is provided which addresses the requirements of this Clause.</p>	<p>Refer to Appendix DD13.</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>(d) a reduction in new materials consumption and use of sustainable materials, including recycled content in concrete, sustainable timber and PVC minimisation,</p> <p>(e) emissions reduction, including reduced flow to sewer and light pollution,</p> <p>(f) transport initiatives to reduce car dependence such as providing cycle facilities, car share and small vehicle parking spaces,</p> <p>(g) land use and ecology, including reduced topsoil removal and contaminated land reclamation.</p>		
	<p>Clause 6.7 - Ground floor development on land in Zone E3</p> <p>Pursuant to Clause 6.7 of the LEP, 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.</p>	<p>The ground floor of the development is being used as a light industry, which is consistent with the requirements of the clause.</p>	<p>N/A</p>
	<p>Clause 7.3 - Design Guide</p> <p>Pursuant to Clause 7.3 of the LEP, 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.</p>	<p>A compliance table reflecting the Proposal's consistency with the Macquarie Park Design Guide is provided which addresses the requirements of this clause.</p>	<p>Refer to Appendix DD33.</p>
	<p>Clause 7.4 - Effect on neighbouring sites</p> <p>Pursuant to Clause 7.4 of the LEP, development consent must not be granted to development on land to which this part applies unless the consent authority is satisfied the development will not result in a neighbouring site becoming—</p>	<p>The Macquarie Park Design Guide does not include any provisions relating to lot consolidation. Notwithstanding, the development will not result in any neighbouring site becoming</p> <ul style="list-style-type: none"> ▪ a site for which 	<p>Refer to Appendix DD33</p>



Statutory Reference	Pre-condition	Relevance / Update	Reference
	<p>(a) a site for which consolidation with an adjoining site is not—</p> <ul style="list-style-type: none"> (i) physically possible, or (ii) reasonably feasible because of the nature of surrounding development, or (iii) a site that has a reduced development potential because of its size, shape or location. 	<p>consolidation with an adjoining site is not physically possible, or reasonably feasible because of the nature of surrounding development, or</p> <ul style="list-style-type: none"> ▪ a site that has a reduced development potential because of its size, shape or location. 	
	<p>Clause 7.7 - Additional requirements for increased building height and floor space ratios on land other than Key Sites</p> <p>Pursuant to Clause 7.7(3) of the LEP, the consent authority may approve development with a height and FSR that does not exceed the increased building height and floor space ratio identified on the Macquarie Park Corridor Precinct Incentive Height of Buildings Map and the Macquarie Park Corridor Precinct Incentive Floor Space Ratio Map, but only if the consent authority is satisfied that the development includes adequate provision for one or both of the following—</p> <ul style="list-style-type: none"> (a) recreation areas that are configured and located in a way that is appropriate for the recreational purposes of the Precinct, (b) an access network that is configured and located in a way that will allow a suitable level of connectivity within the Precinct. 	<p>The Proposal seeks to utilise the incentive building height development standard and provides adequate provision for recreation areas and an access network that is consistent with the provisions of the Macquarie Park Design Guide.</p>	<p>Refer to Appendix DD33</p>



4.2 MATTERS FOR MANDATORY CONSIDERATION

TABLE 14 identifies the matters that the consent authority must consider in deciding to grant consent to this SSDA. It also identifies the section(s) of the original EIS that address these mandatory matters. This should be read in conjunction with the updated Statutory compliance table at **Appendix B**.

TABLE 14: MATTERS FOR MANDATORY CONSIDERATION		
Legislation/Statutory Reference	Matters for Consideration	Section in Original EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	Statutory compliance table at Appendix B
Section 4.15	Relevant environmental planning instruments: <ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Planning Systems) 2021</i> ▪ <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> ▪ <i>State Environmental Planning Policy (Industry and Employment) 2021</i> ▪ <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> ▪ <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> ▪ <i>Ryde Local Environmental Plan 2014</i> 	Statutory compliance table at Appendix B
	Relevant draft environmental planning instruments	Statutory Compliance table at Appendix B
	<u>Development Control Plans</u> Section 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. Notwithstanding this, an assessment of the relevant provisions of the Ryde Development Control Plan 2014 has been undertaken.	Refer to Table 16 of EIS.
	The likely impacts of the development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Part 6
	Suitability of the proposed development	Section 2.7 of the EIS
	The public interest.	Section 6.1.25 of the EIS.
Consideration under EPI		
Section 4.6 of Resilience and Hazards SEPP	The consent authority follows a comprehensive assessment process to ensure any site contamination is properly investigated and, if needed, remediated to make the land suitable for its intended development purpose.	Refer to EIS Section 6.7



TABLE 14: MATTERS FOR MANDATORY CONSIDERATION		
Legislation/Statutory Reference	Matters for Consideration	Section in Original EIS
Section 2.48 of the Transport and Infrastructure SEPP	Development likely to affect an electricity transmission or distribution network. The consent authority must consider any response to a written notice issued to electricity supply authority for the area that is received within 21 days.	Statutory compliance table at Appendix B
Section 2.122 of the Transport and Infrastructure SEPP	<u>Traffic generating development</u> The consent authority must give written notice to Transport for New South Wales (TfNSW) within 7 days after the application is made and consider any response to a written notice issued to TfNSW received within 21 days. The consent authority must give TfNSW a copy of the determination of the application within 7 days after the determination is made.	Statutory compliance table at Appendix B
Section 2.1 of the SEPP Sustainable Buildings	5) <i>Development consent must not be granted to development to which the standards specified in Schedule 1 or 2 apply unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</i>	Refer to EIS Section 6.1.8
Section 3.2 of the SEPP Sustainable Buildings	(2) <i>Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</i>	Refer to EIS Section 6.1.8
RLEP 2014	<ul style="list-style-type: none"> ▪ Zone: E3 Productivity Support ▪ Permissibility: Permissible with consent in the E3 zone as a <i>high technology industry</i>. ▪ Zone Objectives: The development is consistent with the E3 zone objectives which aim to provide land uses of an emerging nature compatible with land uses in the surrounding context. ▪ Maximum Building Height: 30 metres (as shown on the Height of Buildings Map). The proposed development complies with the maximum height control, being 5 metres below the prescribed maximum afforded through Clause 7.7. 	Statutory compliance table at Appendix B
Consideration under other legislation		
<i>Biodiversity Conservation Act 2016</i>	Clause 7.9 of the BC Act applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined the proposal is not likely to have any significant impact on biodiversity values.	A BDAR was issued for the original proposal under section 7.9 of the BC Act which confirms that the proposed development is



TABLE 14: MATTERS FOR MANDATORY CONSIDERATION

Legislation/Statutory Reference	Matters for Consideration	Section in Original EIS
		not likely to have any significant impacts on biodiversity values. This will not change as a result of the amendments. An amended BDAR has been provided (Appendix DD15).



PART 5 ENGAGEMENT

5.1 SUMMARY OF SUBMISSIONS

Following lodgement of the SSDA in June 2025, the project has been publicly exhibited, and community and stakeholder consultation has occurred. **Section 1.3** of this report outlines key dates.

An addendum to the Engagement Report (**Appendix DD32**) has been prepared by Willowtree Communications. It confirms that an appropriate level of engagement has been undertaken, and there is a comprehensive approach to addressing stakeholder concerns through substantial design changes. The revised proposal demonstrates a strong commitment to environmental protection, visual integration, water conservation, and community feedback.

A meeting was also held with the City of Ryde to discuss the proposed amendments. Within the meeting, it was identified that the amended development significantly improved responses to key environmental challenges on site, with particular emphasis on the improvement of visual impacts. Overall, support was given by the City of Ryde of the development in its amended form.

Additionally, DPPI were consulted with prior to lodgement of the Amendment Report, it was agreed that DPPI would accept the lodgement of the Amendment Report and supporting studies.

5.2 RESPONSE TO SUBMISSIONS

TABLE 15 below provides a summary of the Requests for Further Information received following Response to Submissions Report, and key issues raised is provided below, demonstrating that genuine consultation with stakeholders has been addressed.

In summary, the design has been amended as follows which addressed the above concerns raised:

- Reduction in facility capacity from 115.2MW to 76MW.
- Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers to negate previous water demands.
- A reduction in storeys from 6 storeys to 4 storeys. Car parking is now to be located on the ground level, rather than the basement level. The building has also provided increases to setbacks and street activation to Julius Avenue.
- The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW.
- The Richardson Place connection through the site has been removed, with access to loading areas and STSS proposed from Julius Avenue only.
- Removal of western pedestrian connection to the Great North Walk.
- Reduction in GFA to 16,647m².

TABLE 16 details responses to community submissions in a collated manner.



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
NSW DPHI		
<p>1. Infrastructure requirements and utilities Please clarify the following:</p> <ul style="list-style-type: none"> Will the Subtransmission Switching Station (STSS) service only the proposed development, or does the STSS service the broader precinct? Is a bushfire APZ required for the STSS? If an APZ is required, the proposal must assess the impacts of any associated vegetation clearing and update the Biodiversity Assessment Report to quantify the APZ area and associated tree removal. Additional information is required to confirm there is adequate electricity and water availability and infrastructure to service the proposed data centre. 	<p>The STSS will service the broader precinct, which has incorporated APZ areas. The amended scope of development has heavily reduced the reliance on water and infrastructure required to service the proposed data centre.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15) Infrastructure Delivery, Management & Staging Plan (Appendix DD29) Bushfire Assessment (Appendix DD30)</p>
<p>2. Macquarie Park Design Guide</p> <ul style="list-style-type: none"> The development has not demonstrated consistency with the Macquarie Park Design Guide, with specific inconsistencies identified in relation to building line setbacks (Provision 1 and Objective b of Section 5.2), as well as canopy coverage and biodiversity (Provision 10 and Objective d of Section 6.5). <p>All identified inconsistencies with the Design Guide must be clearly addressed, and a comprehensive assessment is required to demonstrate how the proposal achieves the relevant objectives despite any departures from the guideline provisions.</p>	<p>An amended assessment of the Macquarie Park Design Guide against the amended development has been prepared. This includes consideration to setbacks, where a 6m setback has been adopted in compliance with Provision 1 (b) of Section 5.2.</p> <p>The landscape report has also identified that a tree canopy increase of 6.36% has been achieved, demonstrating compliance with Provision 10 (d) of Section 6.5</p>	<p>Landscape Report (Appendix DD12) Macquarie Park Design Guide Compliance (Appendix DD33)</p>
<p>3. Visual Impact Assessment</p> <ul style="list-style-type: none"> Amended photomontages reflecting the project in full, including proposed vegetation clearing and any structures that are proposed in addition to the data centre itself (e.g. the STSS and/or service road). The visual impact assessment, including photomontages, must include the views of the proposed development from the Great North Walk and the shortcut track connecting Richardson Place to the Great North Walk. 	<p>An amended Visual Impact Assessment (VIA) incorporating these changes has been prepared.</p>	<p>Visual Impact Assessment & Report (Appendix DD7)</p>
<p>4. Off-site car parking impacts</p> <ul style="list-style-type: none"> The EIS is to address the loss of parking resulting from the proposed connection of the new street through the site to Richardson Place. The EIS and accompanying Traffic Impact Assessment must clearly detail what is proposed in relation to parking at this location, including any proposed measures to replace lost parking spaces. The impacts must be assessed in accordance with the Traffic, Transport and Accessibility section of the SEARs and Section 6.4.3 of the Guide to Transport Impact Assessment. In addition, evidence of consultation with the landowner of any privately owned parking that will be affected, must be provided. 	<p>An amended Transport Impact & Accessibility Impact Report has been prepared. However, issues pertaining to the removal of street parking at the Richardson Place cul-de-sac are no longer rendered applicable as extensions to Richardson Places are no longer proposed.</p>	<p>Transport Impact & Accessibility Impact Report (Appendix DD8)</p>
<p>5. Hazards</p> <ul style="list-style-type: none"> The risk associated with the storage and use of lithium-ion batteries must be addressed in more detail. While it is noted that pages 7 and 8 of the Dangerous Goods Risk Screening Report commit to compliance with FM Global Data Sheets (FMDS) 5-32 and 5-33, and to undertaking a Fire Safety Study, the Department advises that the critical safety features outlined in FMDS 5-32 and 5-33 should be clearly identified and assessed. <p>It must be verified that these features can be feasibly implemented within the proposed design envelope. While the Department does not require the final design of the data centre at this stage, it is important to confirm that these critical safety measures can be incorporated to mitigate risk in the final development.</p>	<p>An Amended Risk Screening Report has been prepared with respect to the reduced capacity of the proposed development.</p>	<p>Hazard & Risk Report (Appendix DD23)</p>
NSW DPHI (Industry Assessments) Additional Matters for Submissions Report		
<p>Development Footprint</p> <p>1. The Department echoes the concerns raised by City of Ryde and the CPHR Group regarding the development's footprint. The Department notes that key elements of the proposal, including the new internal road connection with Richardson Place, the sub-transmission switching station (STSS), and the enclosed generator gantry at the rear of the data centre building, encroach into the prescribed landscape setback area identified in Figure 37b of the Macquarie Park Design Guide.</p> <p>Given the significance of these concerns, the footprint of the development should be amended to avoid impacts and retain existing biodiversity values in this prescribed landscape setback area.</p>	<p>The development provides increased setbacks on the front and side elevations, as well as an overall reduction in building footprint to limit impacts to biodiversity values.</p> <p>Further, the Richardson Place extension has been removed as it is not required to necessitate the proposed development as outlined in Section 3.4.4 of this Amendment Report.</p>	<p>Section 3.4.4 and 3.5 of Amendment Report. Architectural Design Report (Appendix DD3) Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>Consistency with the Macquarie Park Design Guide</p> <p>3. The proposed data centre development does not satisfy Clause 7.3 of the Ryde Local Environmental Plan 2014, as it is inconsistent with the Macquarie Park Design Guide. Any departures from the Guide's provisions must be justified through an alternative design that demonstrably achieves the relevant objectives, particularly those relating to biodiversity protection, landscape setbacks, and canopy retention.</p>	<p>An amended assessment of the Macquarie Park Design Guide against the amended development has been prepared. This involves considerations</p>	<p>Macquarie Park Design Guide Compliance (Appendix DD33)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
	to increases in setbacks and canopy coverage, as identified above.	
<p>Biodiversity</p> <p>4. A detailed options analysis as per Section 7.2 of the Biodiversity Assessment Method is required to demonstrate all feasible and reasonable alternatives have been investigated to avoid impacts. In determining the preferred option, justifications must also identify any other site constraints (e.g. landscape setback, bushfire risk, flood hazard) that have been considered in determining the development's footprint and layout design.</p>	<p>Further avoidance achieved by removing the former Richardson Place extension, relocation of the STSS and western pedestrian pathway. An options analysis has been undertaken within the amended BDAR in line with Section 7.2 of the Biodiversity Assessment Method.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>Infrastructure Requirements</p> <p>5. To address the SEARs, the Submissions Report must provide details of electricity infrastructure required to service the proposed data centre in its ultimate capacity, including on-site and off-site upgrades, connection points, and any augmentation of the existing network. Additionally, the response must include an infrastructure delivery and staging plan detailing how these works will be co-ordinated with Ausgrid, funded, and delivered to ensure timely implementation prior to the commencement operation.</p>	<p>An Amended Infrastructure Delivery, Management & Staging Plan has been prepared to incorporate information outlined alongside.</p>	<p>Infrastructure Delivery, Management & Staging Plan (Appendix DD29)</p>
<p>6. To enable a comprehensive assessment of water supply, efficiency, and resilience for the proposed development, please address the following</p> <ul style="list-style-type: none"> • Provide a clear breakdown of the development's water demand from inception to ultimate capacity, including annual design, peak, and average potable water use, and specify the water demand for the cooling system and other major end uses. • Identify all water sources proposed for the development, such as potable water, recycled water, rainwater, or other rainfall-independent sources, and indicate their expected contribution to meeting demand. • Confirm whether a feasibility assessment has been undertaken with the relevant Water Utility or an alternative provider, and provide details of any discussions, agreements, or commitments regarding water supply and wastewater servicing. • State the projected Water Usage Effectiveness (WUE) for the development and compare this value to recognised good practice or best practice benchmarks. • Describe the measures proposed to ensure water supply resilience and operational continuity during water restrictions or drought conditions, including any on-site storage or contingency arrangements. 	<p>Amended calculations provided to support the amended development.</p> <p>Consultation with Sydney Water regarding a Section 73 application is evidence of engagement with utilities</p>	<p>Ecologically Sustainable Development Report (Appendix DD13)</p>
<p>Operational Noise</p> <p>7. The collection, processing, and reporting of background noise monitoring data in the Noise and Vibration Impact Assessment does not appear to satisfy the requirements outlined in Fact Sheets A and B of the Noise Policy for Industry (NPfI). Specifically, the Department has identified the following issues:</p> <ul style="list-style-type: none"> • There is no statement justifying the selection of each monitoring location, including the procedure used to choose each location, with reference to the definition of the "reasonably most-affected location(s)" • The L2 data logger was positioned close to trees, and no attempt was made to exclude wind-induced foliage noise, contrary to Fact Sheets A4 and B1.1 of the NPfI • Seasonal variations in background noise levels due to insect activity in the summer months have not been considered (see Fact Sheet A) • There is insufficient long-term monitoring data at the potentially most-affected residences to accurately characterise the existing noise environment. As per Table A1 and Fact Sheet A5, at least one week of valid data covering operational days at all times is required • 15-minute samples affected by extraneous noise were not fully excluded as per Fact Sheet B1.3, noting that where the number of excluded 15-minute samples exceeds 8, 2 or 4 for day, evening or night, respectively, background noise needs to be re-monitored • There is no evidence that the rating background noise levels derived from L1 and L2 during December 2024 are representative of the noise environment at the most-affected residences during times when maximum impacts would likely occur. <p>Note: In determining the reasonably most-affected residence(s) under the Noise Policy for Industry, factors such as existing background levels, noise source locations, distance to receivers, and shielding must be considered. The noise contour maps indicate that certain residential receivers (e.g. RES9-RES10, which are farther set back from Epping Road than RES8, and multi-storey residences farther from Mowbray Road than RES5 and RES6) may experience lower background noise levels than those captured at the monitoring locations. The assessment must justify the selection of sensitive receivers, identify those reasonably most-affected, explain the basis for selecting monitoring/assessment locations, and clarify whether additional background noise monitoring is required.</p>	<p>Table 4 of the amended Noise & Vibration Impact Assessment (NVIA) provides statements justifying the selection of each monitoring location in relation to the existing noise environment and the most-affected receiver locations.</p> <p>Wind-foliage noise was deemed not to have affected the measured noise levels at logger location L2. Review of noise monitoring data and corresponding wind data indicate wind speeds generally well below the maximum 5 m/s. During periods of higher wind speed, noise monitoring graphs do not indicate any observable increase in background noise levels. This is consistent with site observations where the background noise environment was controlled by traffic from the M2 Motorway / Epping Road</p> <p>The trend shown in noise logging graphs does not appear to be indicative of dominant insect noise and generally show noise levels typically expected of their respective environments. Notwithstanding, additional review of data will be</p>	<p>Noise & Vibration Impact Assessment (Appendix DD18)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
	<p>carried out and reported in the updated assessment report.</p> <p>Over one week of valid monitoring data across all time periods has been collected at the logger locations and thus is representative for all time periods when maximum impacts occur.</p> <p>Extraneous / weather affected data including excessive wind has been excluded as per the NPfi and detailed in Appendix B.1.2 of the NVIA.</p> <p>The monitoring locations are considered appropriate for the most-affected locations. Irrespective, the Project Specific Noise Trigger levels in NCA 2 and NCA 3 are determined by the lower fixed amenity criteria and not based on the background noise levels (the intrusiveness criteria). Background levels would need to be significantly lower to materially impact the criteria.</p> <p>Notwithstanding, regarding NCA2, RES9 and RES10 are not significantly further from the M2 Motorway/Epping Road which determines the background noise level of the area. On elevated floors, where predicted noise levels are higher, exposure to road noise would also increase, offsetting any marginal reduction due to distance.</p> <p>For NCA3, the noise contours indicate that receivers RES5 and RES6 are the most affected receiver locations, for which the L3 logging location is representative</p>	
<p>8. To support a clearer understanding of predicted noise impacts, please provide the following updates to the Noise and Vibration Impact Assessment:</p> <ul style="list-style-type: none"> • A three-dimensional version of Figure 3 ("Noise modelling inputs and noise source locations"), similar to the façade noise maps shown in Figures 6 and 7, to better illustrate vertical source locations and building geometry. • Consistent receiver labelling across all figures and maps. The numbering of commercial receivers differs between Figure 2 and the noise contour maps in Appendix C. Please label all receivers on the contour maps and adjust typology as needed to maintain legibility. • Given the complex topography surrounding the site and the fact that the highest operational noise levels originate from elevated parts of the data centre, please provide vertical noise grids for residential receivers in Noise Catchment Areas 2 and 3. This is particularly important as the contour maps are based on impacts measured two metres above ground level, whereas Table 3 of the NVIA confirms that all residential receivers are two storeys or greater. • An inventory of all potential noise sources (e.g. cooling equipment, transformers, shunt reactors, circuit breakers, cooling fans, corona discharge, capacitor banks, and disconnectors) • Noise mitigation measures applied to each source (e.g. acoustic enclosures, low-noise equipment), along with expected reductions. • Evaluation of cumulative operational noise associated with the data centre and substation (if proposed on the site) for any potential annoying noise characteristics such as tonality and dominant low-frequency content 	<p>The items specified alongside have been incorporated into the amended NVIA.</p>	<p>Noise & Vibration Impact Assessment (Appendix DD18)</p>
<p>Construction Noise</p>	<p>The highest exceedances are predicted during the site</p>	<p>Noise & Vibration Impact Assessment (Appendix DD18)</p>



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Key Issues	Response	Supporting Appendix / Section
<p>9. The relevant noise management level of LAeq,15min 70 dB(A) at 3 Richardson Place is predicted to be exceeded by up to 11 dB during site establishment, demolition, excavation, road works and building construction. Despite this, the Noise and Vibration Impact Assessment provides only generic mitigation measures, without assessing their effectiveness at the most-affected commercial receiver.</p> <p>To address this information gap, receiver-specific noise management strategies are needed, including an evaluation of scenarios where temporary noise barriers may be effective at reducing noise received at a multi-storey building, and details of consultation with the tenant at 3 Richardson Place to determine the feasibility of scheduling activities to minimise construction noise impacts.</p> <p>As per the Interim Construction Noise Guideline, the level of assessment should reflect the duration and severity of impacts. The updated noise report must demonstrate how feasible and reasonable measures will minimise noise impacts at 3 Richardson Place over the 238-week construction period, with specific regard to the duration and severity of predicted exceedances.</p>	<p>establishment, demolition and excavation stage, and the roadworks stage.</p> <p>This is primarily due to use of an excavator with a hydraulic hammer, jack hammer or rock saw attachment.</p> <p>This has been presented as a worst-case scenario; however, these items would not be used continuously throughout the works period.</p> <p>Opportunities to provide physical mitigation such as barriers are not considered effective for the protection of multi-storey receivers (per Table 29 of the NVIA).</p> <p>Therefore, the identified mitigation and management measures are considered to be appropriate, including the preparation of a detailed CNVMP by the contractor, notification to affected receivers, provision of respite periods where excessive noise levels are identified, and a complaint handling procedure.</p>	
<p>Air Quality, Climate and Local Environmental Impacts</p> <p>10. It is noted that the EIS documentation does not include an assessment of potential air pollution or urban heat island effects on nearby sensitive public recreation areas, such as the Great North Walk. These areas may be particularly vulnerable to changes in local air quality and microclimate conditions, especially during prolonged generator testing or other heat- and emission-generating activities. In addition, the proposal involves the clearing of significant vegetation, which may further exacerbate both air quality impacts and localised urban heat effects by reducing natural shading, evapotranspiration, and pollutant filtration.</p> <p>Please provide an assessment of potential air quality and urban heat impacts on these types of receivers, including:</p> <ul style="list-style-type: none"> • Identification of relevant public recreation areas within the potential impact zone • Consideration of cumulative heat and emissions from proposed activities (e.g. generator operation from 7 am to 6 pm), in the context of vegetation removal • Any mitigation measures proposed to minimise impacts on users of these areas. <p>This information is required to ensure that potential impacts on public health, amenity, and the local environment have been adequately assessed.</p>	<p>The amended Air Quality Impact Assessment (AQIA) includes additional sensitive receptor locations positioned along nearby public recreation areas, including several points on the Great North Walk (Receptor R25 to receptor R32). These receptors represent key public use areas such as the Riverside Walk, Fairylands, Ironbarks, and Carters Creek.</p> <p>Figure 4 and Table 9 have been updated, and both incremental and cumulative pollutant concentrations have been predicted for these locations. Assessment of urban heat and microclimate effects is outside the scope of the AQIA.</p>	<p>Air Quality Impact Assessment (Appendix DD17)</p>
<p>11. In accordance with NSW Guide for Large Emitters, the proposed development must prioritise avoidance of emissions, including those associated with vegetation clearing. The Submissions Report must provide evidence of efforts to avoid clearing, such as consideration of alternative site layouts or designs (e.g. a taller built form with smaller development footprint), or a justification for why avoidance is not feasible</p>	<p>In the revised design, the building footprint has been reduced, and the structure now sits entirely within a 6m setback from both the front and side boundaries.</p> <p>The generator structure has been required to be in its current location due to required buffer distance as outlined in Section 6.2.2 of this Amendment Report.</p>	<p>Section 6.2.2 of Amendment Report</p>
<p>Legal Restrictions on Title</p> <p>12. Please provide a plan that overlays the easements and rights of carriageway that burden the site onto the Site Plan from the architectural drawing set.</p>	<p>The amended Architectural Plans now include this item.</p>	<p>Architectural Plans (Appendix DD2)</p>



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<p>Traffic and Access</p> <p>13. The Transport Impact Assessment Report must be updated to provide a road safety assessment and pavement assessment in accordance with the TfNSW Guide to Transport Impact Assessment. These assessments are necessary to identify any geometric improvements or pavement upgrades required to accommodate servicing vehicles associated with the development. Additional information must also be provided to justify why Medium Rigid Vehicles are considered the largest vehicles to be utilised in association with the operation of the data centre.</p>	<p>During construction, access for the installation of STSS equipment has been assessed using Articulated Vehicles (AVs) and a 400-tonne mobile crane, with these movements managed under the Construction Traffic Management Plan (CTMP). For ongoing operation and servicing of the STSS, it is expected that Medium Rigid Vehicles (MRVs) will be the largest vehicles accessing the site, noting that this vehicle type is typical for data-centre servicing operations.</p>	<p>Transport Impact & Accessibility Impact Report (Appendix DD8) Construction Traffic Management Plan (Appendix DD9)</p>
<p>14. Construction traffic and ongoing service vehicle movements may not only affect local businesses and congestion, but also reduce the amenity and safety of pedestrians and bush track users, particularly where heavy vehicle access interfaces with public walking routes. The Applicant must assess these impacts in detail, including potential conflicts at pedestrian crossings, shared paths, and bush track entry points. Mitigation measures, such as traffic calming, signage, restricted access times, and alternative routing, should be considered to minimise disruption and ensure pedestrian safety. This assessment should also address cumulative impacts during peak construction periods and provide justification for the proposed vehicle access arrangements in sensitive interface areas.</p>	<p>Potential impacts to pedestrians, public paths and amenity associated with construction and service vehicle movements have been assessed in the CTMP. The CTMP identifies access via Julius Avenue only and includes traffic control, supervision, signage and management measures to minimise safety and amenity impacts during construction.</p>	<p>Construction Traffic Management Plan (Appendix DD9)</p>
<p>Clarification of Technical and Operational Details</p> <p>15. The EIS cites a STSS with a capacity of 180 MVA, whereas the planning advice letter from Ausgrid, located in Appendix 29 of the EIS, indicates an ultimate demand of 240 MVA. Further information is required to clarify the staging of the proposed development and its ultimate power consumption.</p>	<p>The amended Infrastructure Delivery, Management & Staging Plan calculates the max electrical demand after diversity to be 113.5MVA, refer to Section 4.1 of this report.</p>	<p>Infrastructure Delivery, Management & Staging Plan (Appendix DD29)</p>
<p>16. Further information is required to clarify the anticipated total duration of backup generator usage and testing per year, excluding power outage events. The Department notes discrepancies across the EIS, with quoted totals of 194.4 hours (Noise and Vibration Impact Assessment), 197.1 hours (Air Quality Impact Assessment), and 256 hours (Greenhouse Gas Assessment). Please confirm the correct figure and explain the basis for the variation with reference to any manufacturer requirements for efficient operation and avoidance of improper operation.</p>	<p>The discrepancies noted in earlier assessments reflect previous versions of the generator inventory and testing assumptions. With the reduced number of standby generators, the Applicant has recalculated the testing regime, resulting in a revised annual total of 132.3 hours based on a 27-minute test cycle (22 minutes runtime plus 5 minutes cooldown (refer Table 5)). This remains well below the 200 hour exemption threshold under the POEO Act for scheduled electricity generation activities.</p> <p>The updated total is derived from the monthly functional testing program, which allows for up to 25 test events per month.</p>	<p>Air Quality Impact Assessment (Appendix DD17)</p>
<p>17. The Air Quality Impact Assessment notes there could be up to 37 tests conducted each month. Further information is required to clarify the maximum duration of testing on any given day, noting that the proposed operating hours suggest testing could occur for up to 11 hours continuously from 7am to 6pm. This clarification is necessary to assess potential short-term impacts and cumulative exposure risks, including those related to noise and urban heat.</p>	<p>The testing program includes up to 25 generator tests per month, with each generator completing a 27 minute cycle (22 minutes runtime and 5 minutes cooldown). Testing is carried out in pairs i.e. two at any one time, with one generator on the eastern side and one on the western side operating at the same time. Under this configuration, the</p>	<p>Air Quality Impact Assessment (Appendix DD17)</p>



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	maximum possible testing duration on any given day is governed by the sequential scheduling of these paired 27 minute tests. Even if all monthly tests were conducted on a single day, a scenario that is operationally unlikely with the total cumulative testing period would equate to approximately 11 hours [27 minutes x 24.5 generator tests]. In practice, testing would be distributed across several days each month in accordance with operational requirements. Testing is anticipated to be constrained to within daytime hours (7:00 am – 6:00 pm). The short duration of each test, combined with the two-unit testing limit, constrains potential short-term and cumulative impacts. These parameters have been incorporated into the AQIA	
18. The Noise and Vibration Impact Assessment has adopted the MTU 20V 4000 G94LF generator for assessment, whereas the Air Quality Impact Assessment has adopted the CAT C175-20 diesel generator. Unless otherwise justified, please clarify which generator model is proposed and ensure consistency across technical assessments.	Worst case scenarios have been adopted in lieu of a model being selected. In this case, MTU 20V 4000 G94LF generator has been assessed an acoustic worst case, and CAT C175-20 for an emissions worst case.	Air Quality Impact Assessment (Appendix DD17) Noise & Vibration Impact Assessment (Appendix DD18)
19. There is an inconsistency between the Power Use Effectiveness (PUE) quoted in the EIS (1.35 on page 133) and the ESD Report (1.27). Please confirm the correct figure.	Power Use Effectiveness (PUE) figures have been updated to account for the revised air-cooled chiller design. Peak PUE for the purpose of maximum demand calculation for the hottest period of the year is calculated at 1.6 (refer section 4.1 of the Infrastructure Report). The target annualised PUE for the project is 1.39 (refer to section 3.1.1 of the ESD Report).	Ecologically Sustainable Development Report (Appendix DD13)
20. The Erosion and Sediment Control Plan (241920-TTW-00-DR-CI-02101-B) shows an indicative location for an earth basin that appears to overlap with the footprint of the STSS. Please clarify how this basin will function during construction.	The amended Civil Engineering Report has considered the amended layout limiting conflict with the proposed earth basin. The earth basin location will be adjusted throughout construction to meet staging requirements.	Civil Engineering Report (Appendix DD21)
City of Ryde		
<p>1. Engagement with City of Ryde Council.</p> <p>Council notes that the applicant has undertaken detailed and considered engagement with City of Ryde prior to the EIS being submitted. This advice is attached with the application.</p> <p>The applicant's early engagement with Council has resulted in the application as submitted considering Councils feedback and addressing to matters raised in the EIS. This consultation and feedback process was beneficial to Council, the applicant and the DPHI as the applicant's response has mostly addressed Council's key concerns with the application.</p> <p>The applicant is thanked and commended for this engagement, as it's an example of engagement done right to resolve key issues prior to lodgement of any application.</p>	Noted	N/A



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<p>Council has attached its previous advice at Attachment 2.</p>		
<p>2. Contributions and Public Benefit</p> <p>2.1. Contributions</p> <p>The Macquarie Park Section 7.12 Contributions Plan 2025 applies to the land. A contribution will be required in accordance with this plan and is calculated based on 1.5% of the cost of development.</p> <p>Council notes that the application does not propose the STSS and suggests that it will be done under separate application. Councils' submission will outline that Council does not support the STSS being left to separate application and that the application must be amended to include the STSS.</p> <p>The applicant must provide an updated EDC report that values the STSS. Once an updated EDC report has been provided Council will be able to draft a 7.12 contribution condition for DPHI. The revised EDC report can be provided to Council under separate cover.</p>	<p>An amended Estimated Development Cost (EDC) Report has been prepared reflective of the amended development.</p>	<p>Estimated Development Cost Report (Appendix DD1).</p>
<p>2.2. Draft Letter of Offer</p> <p>Appendix 31 of the EIS contains a draft letter offer to enter a VPA with Council (dated 24 June 2025). Council's pre-EIS advice outlined what matters Council would consider in a proposed public benefit offer, all of which have been ignored in the applicants proposed public benefit offer. The proposed offer is not supported and requires further engagement with Council. Council will discuss the offer directly with the applicant to resolve the issues and will require an amended letter of offer.</p>	<p>An amended Voluntary Planning Agreement has been prepared.</p>	<p>Voluntary Planning Agreement (Appendix DD31)</p>
<p>2.3. Comment on current offer</p> <p>While Council is generally supportive of a VPA to address the requirements of clause 7.7 in RLEP, the proposed calculation of monetary contributions and suggested offsets are not supported.</p> <p>The proposed offsets do not provide a broader public benefit and cannot be accepted to reduce the applicable monetary contribution. Any offsets for these proposed works will result in adverse impacts to access network and recreation outcomes throughout the Macquarie Park Precinct.</p> <p>The consent authority cannot be satisfied that the requirements of clause 7.7 have been addressed until the offer has been amended to reflect Council's concerns and a VPA has been agreed between the parties.</p> <p>The Macquarie Park incentive scheme has been operating since 2014 and is the primary mechanism to deliver the fine grain road network and recreation areas in the precinct. The scheme allows the provision of a monetary contribution (calculated in accordance with the incentive rate in Council's adopted Fees and Charges) to utilise the incentive height and FSR provisions of RLEP.</p> <p>Where certain recreation and access infrastructure (identified in Part 4.5 of the Ryde DCP) is directly provided by a development, the monetary contribution may be offset by the value of this infrastructure. Any offsets for infrastructure that does not provide a broader public benefit will reduce Council's availability to deliver the necessary access and recreation infrastructure across the precinct. The identified infrastructure has been considered in the recent rezoning of the Macquarie Park Precinct and has a clear and demonstrated public benefit.</p> <p>The importance of the incentive scheme for delivering the identified access and recreation infrastructure is recognised in DPHI's Macquarie Park Infrastructure Delivery Plan (IDP). The IDP relies on the continued operation of this scheme to deliver infrastructure across the precinct including centralised local open space, the delivery of the fine grain road network and road widening works (including the widening of Julius Avenue opposite the development site).</p> <p>The proposed offsets on the site do not provide a broader public benefit that outweighs the benefits of the identified items. The proposed offsets are inconsistent with the IDP and, if accepted, will undermine the delivery of infrastructure across the precinct. The following aspects of the Applicants offer are not agreed.</p> <p>Incentive contribution rate</p> <p>The letter of offer has not been submitted to Council and was identified during the public exhibition of the EIS documentation which commenced on 31 July 2025. As of 1 July 2025, the incentive rate in Council's adopted Fees and Charges 2025/26 is \$500/m². This rate must be applied in the calculation of the applicable monetary contribution.</p> <p>Proposed offsets</p>	<p>An amended Voluntary Planning Agreement has been prepared.</p>	<p>Voluntary Planning Agreement (Appendix DD31)</p>



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<p>The letter of offer seeks an offset to the monetary contribution for the value of works and easements to be delivered on privately owned land. The offer values these works at \$8,753,638. However, these works are not identified in in the Ryde DCP and do not provide a broader public benefit that justifies an offset to the monetary contribution.</p> <p>Neither the Ryde DCP nor DPHI's Macquarie Park Design Guide identify any required recreation infrastructure on the site. The strategy for delivering required recreation infrastructure in Macquarie Park focuses on centralised open space and community facilities at key locations throughout the precinct. The provision of these identified recreation facilities will be funded by Council using monetary contributions received under the incentive scheme.</p> <p>The offer proposes an offset for the following recreation works on the site:</p> <ul style="list-style-type: none"> • Recreation works and easement fronting Julius Avenue • Construction of open area (lookout) and easement on eastern boundary • A boardwalk connecting the future internal road to the National Park at the rear of the site. <p>These works are proposed on privately owned land and do not provide a broader public benefit to anyone outside of the development site. The property is already subject to an easement for recreation purposes and a right of carriageway which provides access to the National Park.</p> <p>There is no public benefit in providing an additional connection on the same property, particularly if this additional connection will jeopardise the delivering other necessary recreation infrastructure throughout the precinct.</p> <p>Additionally, the proposed boardwalk to the National Park is located adjacent to the future 132 kilovolt switching station. This will eliminate any potential amenity of a boardwalk in this location. Recreation works on privately owned land will create ongoing operational, maintenance and liability issues. These spaces are also likely to be inconsistent with CPTED principles and will attract anti-social behaviour, particularly the spaces directly adjacent to and hidden behind the future seven-storey building. This is not a public benefit.</p> <p>The offer proposes an offset for the following access network works on the site:</p> <ul style="list-style-type: none"> • Construction of footpath upgrade and easement from Julius Avenue (along western boundary of site) • Construction of footpath upgrade and easement from Julius Avenue (along eastern boundary of site) • Construction and easement over a new east-west section of road on the site. <p>The Ryde DCP does not identify any access network infrastructure to be provided on the site. The Design Guide identifies a new section of local street (14.5m-wide) bisecting the property in an east-west direction.</p> <p>Council previously advised the applicant that this new road is not required for broader precinct connectivity and should not be dedicated to Council. It connects two privately owned sections of driveway and is only required to service the development site. It provides no broader public benefit. Council's advice on the future ownership of this road is used by the applicant to justify a reduced road design that is inconsistent with the requirements of the Design Guide. No offset can be provided for access infrastructure that does not provide a broader public benefit, particularly if it has not been designed in accordance with the requirements of the Design Guide.</p> <p>The proposed offsets have no broader public benefit, and if accepted will result in a shortfall in monetary contributions to fund the required infrastructure across the precinct. Any offset will have a detrimental impact on the access and recreation outcomes of the Macquarie Park precinct and will not satisfy the requirements of clause 7.7 of RLEP.</p> <p>The offer must be updated to:</p> <ul style="list-style-type: none"> • reflect the current incentive rate of \$500/m² • remove any offsets for proposed recreation and access infrastructure on the site • require payment of the monetary contribution prior to the issue of a Construction Certificate. <p>Once an updated offer is received and agreed by Council, a draft VPA can be prepared and exhibited concurrent to the assessment of the application.</p>		
<p>3.1. Building scale and bulk</p> <p>The proposed building bulk and scale are not responsive to the local character, particularly the natural bushland environment of Lane Cove River Reserve. It also significantly impacts the views and vistas from public domain and waterfront area. Council has raised concerns regarding the following photomontages of the selected viewpoints presented in the Visual Impact Assessment Report.</p> <p><u>Recommendation</u></p> <p>Council notes that the built form is driven by operational requirements associated with a data centre, however the applicant can introduce particularly on the Julius Avenue frontage a built form that adopts increased building setbacks or introduce a podium elements.</p>	<p>The design has been refined to address visual and contextual considerations. Specifically, the front and side setbacks have been increased to 6 meters, creating greater separation from property boundaries and reducing the building's perceived dominance within the streetscape. In addition, the overall building height</p>	<p>Architectural Plans (Appendix DD2) Architectural Design Report (Appendix DD3)</p>



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<p>Additionally Visual Impacts would be greatly reduced if a revised colours and material pallet was considered that was sensitive to the surrounding national parl.</p> <p>The Applicant is to demonstrate the design considerations and solutions to reduce the building bulk and the visual impacts, as well as the interface with public domain and bushland. Wider setbacks along Julius Avenue are also encouraged to mitigate the impacts.</p>	<p>has been lowered and ensures a more proportionate scale that aligns with the surrounding built form.</p> <p>Furthermore, the selection of facade materials and colour palette has been revised to achieve better integration with the local environment, thereby enhancing aesthetic harmony and reducing potential visual impacts.</p>	
<p>3.2. Façade and material</p> <p>The façade design strategy and material selection should respond to the local character and context. Council is concerned that the reflectivity of the proposed polished metal cladding on the expansive blank wall along the Julius Avenue may negatively impact on the neighbouring buildings as well as car drivers and pedestrians. Additionally, the western façade with the same material is likely to affect the building at 10 Julius Avenue</p> <p>Recommendation</p> <p>It is recommended that the applicant revisit the façade strategy and material selection to ensure a contextually responsive design outcome, mitigate visual impacts, and reduce the risks associated with reflectivity. Any RtS response should include a reflectivity assessment to demonstrate the proposed façade is suitable.</p>	<p>The facade cladding colour scheme has been refined to transition from green at the lower levels to blue tones toward the upper levels, creating a gradient effect that visually integrates the building with its natural and urban surroundings.</p> <p>This approach enhances architectural cohesion and reduces visual dominance within the streetscape. Additionally, a matte finish has been applied to the cladding material to minimize surface reflectivity, thereby reducing glare and mitigating potential safety or environmental risks associated with reflective surfaces. These adjustments aim to improve both aesthetic harmony and functional performance of the facade</p>	<p>Architectural Plans (Appendix DD2) Architectural Design Report (Appendix DD3)</p>
<p>3.3. Security Fencing</p> <p>Council notes and acknowledges the applicant reduction and revision of security fencing particularly reducing the extent and size of facing along Julius Avenue to a 1.5m height and providing a security fencing that is low scale and more compatible in visual terms (mesh). 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.</p> <p>Council notes the remaining security fencing strategy for the site and the proposed fencing generally aligns with Council's Pre-EIS advice and is supportable. The Applicants strategy at reducing fencing height and visual impact at key contributory frontages whilst still achieving the requirements of a hyper scale data centre demonstrates how other data centre applications within Macquarie Park can do the same.</p>	<p>Noted.</p>	<p>N/A</p>
<p>3.4. Visual Mass and reduction strategy</p> <p>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.</p> <p>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.</p> <p>To alleviate the STSS visual impact as a result of its bulk and scale the following items are recommended to be considered:</p> <ul style="list-style-type: none"> • 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 <p>It is recommended that the RtS submission include details of mitigation measures that reduce the visual mass of the STSS, and include details of proposed public art.</p>	<p>The amended development layout has reduced the visual mass considerably, limiting the requirement for the provision of public art.</p>	<p>Architectural Plans (Appendix DD2) Architectural Design Report (Appendix DD3)</p>



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<p>3.5. Ground Floor Development in land zoned E3</p> <p>As the site is zoned E3 under the RLEP 2014, Clause 6.7 applies to the development. Clause 6.7 of the RLEP 2014 is a precondition to granting development consent, that requires the ground floor of a development be used for commercial activities.</p> <p>Based on the applicants plans, the applicant satisfies this precondition as the ground floor of the development is being used for commercial activities. It's noted that all parking is provided in the basement therefore the application satisfies the pre-condition of consent.</p>	Noted.	N/A
<p>3.6. Existing consent that applies to the site</p> <p>Council notes that the site has an activated consent known as MOD No.1395/1999 that applies to the site. Should DPPI be minded granting consent to the proposed SSD application, the applicant would be required to surrender MOD No.1395/1999 in accordance with Clause 67 of the Environmental Planning and Assessment Regulations 2021.</p> <p>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 will provide a recommended condition of consent at a later date on this matter.</p>	Noted.	N/A
<p>4.1. General Comment</p> <p>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."</p> <p>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 STSS development would be assessed under Part 5 of EPAA, with Ausgrid as the proponent. The material provided to date does not make it clear:</p> <ul style="list-style-type: none"> 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. <p>Based on the information provided with the EIS, Council is not satisfied that the STSS is suitable in its proposed location or how its operations will impact the surroundings. Particularly Council raises concerns with the indicative location of the STSS and its impact on ecological values on the site. Council notes that the development involves significant vegetation removal, with the predominate removal associated with the STSS.</p> <p>For Council to consider the removal of this vegetation it would be anticipated that "development" would be proposed that would justify its removal.</p>	<p>The STSS has been relocated adjacent to the data centre building, as well as the former Richardson Place extension being removed.</p> <p>This has significantly reduced the extent of vegetation clearing while simultaneously ensuring that the STSS remains accessible by Ausgrid.</p>	<p>Architectural Plans (Appendix DD2) Architectural Design Report (Appendix DD3) Transport Impact & Accessibility Impact Report (Appendix DD8) Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>4.2. Approval Pathway</p> <p>Council notes that the proposed STSS is generating significant environmental impact whilst not technically proposed under the subject application. It is understood that the STSS is being proposed by Ausgrid under Part 5 REF.</p> <p>Due to the impact of the STSS, for the consent authority to be satisfied of the proposed development Council seeks that the STSS be proposed with the Data Centre application, as the Data Centre heavily relies on the STSS being active and operational for the Data Centre to be operational.</p> <p>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 a part of the subject EIS.</p> <p>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). Given that the Data Centre cannot operate without the STSS as the data centre relies on having connection to electricity, and that Macquarie Park is currently in an electricity supply shortage, due to "Major Customers" taking all remaining electricity supply, the application should be amended to include the STSS.</p> <p>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. 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. Since the Subject SSDA seeks the removal of vegetation/excavation, it permits the STSS as REF rather than requiring an EIS be prepared. Council seeks the following:</p> <ul style="list-style-type: none"> The EIS be amended to include the STSS as a part of the subject SSDA. The EIS and supporting appendixes be amended to include appropriate assessments/ include mitigation measures for additional development associated with the STSS. The provided QS report be amended to include the value of the STSS. 	The STSS location has been amended to be incorporated adjacent to the building, and forms part of the scope of development.	Estimated Development Cost Report (Appendix DD1).



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Key Issues	Response	Supporting Appendix / Section
<p>4.3. Location of STSS</p> <p>Site Development History</p> <p>Relevant to the application is the site has an existing development consent issued by Council known as DA1395/1999. This application has been modified several times. The original consent was for:</p> <p>Construction of four (4) and six (6) storey commercial buildings over basement car parking.</p> <p>The application was then subsequently modified by the applicant that reduced the size of the rear buildings and transferred GFA into the front portion of the site. Council, the applicant and Court ultimately agreed to impose a new condition of consent that required "new" development consents be obtained for rear buildings known as B& C and a new café.</p> <p>Modified Consent dated 26 July 2004 imposed the following conditions:</p> <ul style="list-style-type: none"> 65. A local development application is to be submitted for Buildings B and C. The building envelope and floor space is to be in accordance with the approved architectural plans as per condition 1 contained within this development consent. 66. A local development application is to be submitted for the cafe. This application is to include full details of the floor plan, elevations, section plus a statement of environmental effects. The building envelope and floor space is to be in accordance with the approved architectural plans as per condition 1 contained within this development consent. <p>Noting the above development history the rear part of the site never received full development approval for the removal of all trees and the associated footprint of the built form was significantly reduced.</p> <p>Current Location of STSS</p> <p>Council considers that the location of the STSS should be revised to ensure the protection of ecological sensitive lands. The location of the STSS being separated from the main data centre is of concern to Council due to the vegetation and biodiversity impacts outlined in Appendix 15 (BDAR).</p> <p>The BDAR indicates that approximately 168 eco-credits must be retired because of the development. Based on review of Appendix 15 most credits are result of the location of the STSS and the associated tree removal/ rock removal. Figure 5 Shows the indicative location of the STSS being central to Direct Impacted Areas. The STSS location results in significant impact to native fauna and flora habitat and as a result its current location is unsuitable unless demonstrated otherwise.</p> <p>Whilst impacts to a certain degree may be unavoidable, the application must demonstrate avoidance principles before the current location of the STSS is supportable by Council. The rear part of the site contains biodiversity values, and the existing development consent was modified to not have approval from Council for removal of significant vegetation.</p> <p>Given this the current location of the STSS cannot be supported due to biodiversity impacts, unless it is demonstrated that alternatives have been considered, and the proposed location is most suitable. Council recommends that the following occur:</p> <ul style="list-style-type: none"> • The applicant provides robust justification as to why the current location of the STSS is suitable and why there are no other suitable locations (such a internal to the data centre), or • The applicant revise the site layout to include the STSS as apart of the existing building footprint, or; • Reduce the size of the footprint of the STSS, it is currently suggested as being 60mx30m². Details on maximum size requirements should be provided and the scope of the STSS should reduced in size to minimize impacts. • If the STSS was included with the SSDA rather than left to another approval pathway, it would provide additional justification on biodiversity impacts. <p>It's noted that the STSS as stated in Appendix 29 is solely for the subject site and not for external customer use. Given this incorporating the STSS as a part of the main data centre should be explored as there is not expected to be significant security concerns for a structure that supports the main operation. Council would be supportive of transferring any lost GFA into a higher building form, subject to appropriate impacts and a revised Clause 4.6 for Building Height.</p>	<p>As previously mentioned, the STSS has been relocated adjacent to the data centre building, in alignment with recommendations alongside.</p> <p>This has considerably reduced the extent of vegetation clearing required on site and ensured an overall improved developmental outcome with regards to biodiversity.</p>	<p>Architectural Plans (Appendix DD2) Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>5.1. Tree removal and replacement plantings</p> <p>On submission of the EIS, the Applicant has now clarified that:</p> <ul style="list-style-type: none"> • A total of 38 trees are proposed for retention (not including trees within the dense bushland area) • A total of 509 trees (in 188 tree groups) are proposed for removal • Of those 509 trees earmarked for removal, approximately 200 trees are low retention and are likely to be regrowth since the site was excavated as part of No. 1395/1999. • A total of 143 trees are provided to compensate for canopy loss. 	<p>The following amendments to the development with regard to tree removal (as identified in the amended Landscape Report)</p> <ul style="list-style-type: none"> ▪ A total of 235 trees are proposed for retention (not including trees within the dense bushland area) 	<p>Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)</p>



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<p>Council provided advice previously to the applicant that 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 6 shows the remnant vegetation that if removed requires replacement planting at a 3:1 ratio.</p> <p><i>Council advises that:</i></p> <ul style="list-style-type: none"> Based on the above planting of 143 trees to compensate for canopy loss, Council assumes that 166 trees would not be able to be undertaken on the site and are subject to the planting ratio of 3:1 equals 498 trees. <p><i>Should these tree replacements not be able to be undertaken on the subject site, a fee should be paid to Council, consistent with the fee detailed in Council's Fees and Charges for replacement tree plantings to occur on Council Land. Council's draft condition provided below:</i></p> <p><i>Tree Replacement Planting: On issue of a construction certificate, tree replacement plantings are to be undertaken on a ratio of 3 to 1. Where replacement trees cannot be planted on the site, prior to the issuing of a construction certificate, the Applicant to pay a fee to City of Ryde Council for each tree planting to occur on private land, equivalent to that identified in its Fees and Charges Schedule for the purposes of planting a tree on Council Land.</i></p>	<ul style="list-style-type: none"> A total of 334 trees (in 162 tree groups) are proposed for removal Of those 334 trees earmarked for removal, approximately 149 trees are low retention and are likely to be regrowth since the site was excavated as part of No. 1395/1999. Refer Drawing JADC-ALA-LA-000001 A total of 36 trees are provided to compensate for canopy loss. Refer Drawing JADC-ALA-LA-000400 <p>Conditions regarding replanting fee calculations are hereby requested,</p>	
<p>5.2. Bush Fire Management</p> <p>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. In review of the EIS and Appendix 30 the Bushfire Attack Level (BAL) that the development will be constructed too is Flame Zone (FZ)</p> <p>Council requires further clarification on RTS Submission if Appendix 30 has considered the STSS in its assessment and any associated bushfire requirements with the STSS. Council notes that the previous consent (Figure 7) required the area between buildings B & C (similar location to STSS) was required to be managed as a Fuel Free zone whilst insuring any surrounding trees be retained. Appendix 30 Asset Protection Zone (APZ) map has excluded the STSS from the relevant APZ and based on the previous consent additional mitigation measures would be required.</p> <p>Council recommends that referral to the Rural Fire Service is undertaken to confirm the relevant bushfire requirements applicable to the site.</p>	<p>An amended Bushfire Assessment has been prepared factoring in the amended design incorporating the STSS being located adjacent to the data centre building, inclusive of Asset Protection Zones (APZ).</p>	<p>Bushfire Assessment (Appendix DD30)</p>
<p>5.3. Resilient development</p> <p>As the site is in a sensitive area that is subject to unique environmental constraints and proposes a unique land use that if not planned appropriately exacerbate these environmental constraints creating unique stresses and shocks, Council seeks that the development is planned resiliently to deal with these stresses and shocks.</p> <ul style="list-style-type: none"> It is recommended that the Applicant refrain from using timber in any viewing platforms, consult with National Parks and Councils bushland team for advice on technical path design best practice given bushfire potential. The EIS states that: o Electricity services should be located so that the possibility of ignition of the surrounding bushland or fabric of the buildings is limited. Regular inspection of the electricity lines should be undertaken to ensure they are not impacted by branches. The recommendation within the report conflicts with Ausgrid provisioning location at the back of the site. Given the proposed location of the STSS further information on the suitability of the STSS location is required. Gas should be avoided in the first instance to comply towards electrification goals and direction of under NABERS. The location of any gas services should vent facing away and not lead to the ignition of surrounding bushland or the fabric of the buildings. Fire assessment is recommended to be amended to consider cumulative risk from neighbouring data centres and fire run ability. A risk assessment must be undertaken in alignment with the SEPP to identify climate risk and hazards on site considering the national park/ bushland and flame zone area. Currently these are reviewed in isolation not considering risk factor The EIS Architectural Design report confirms that the site 'Due to existing environmental and site constraints, it is not possible to achieve the full minimum Asset Protection Zones (APZs) typically required.' Which places this site at elevated high risk given the fuels stored on site, location of generators proposed and associated heat and fuels and fire run. Therefore the footprint should be considered to ensure it complies with Planning for Bushfire Protection Standards for APZ's. The Fire Assessment - assumes: the Acceptable Solution under Table 7.4a of PBP requires APZs be provided in accordance with Table A1.12.2 or bushfire design modelling demonstrating the maximum radiant heat will not exceed 29kW/m², consistent with that for residential subdivisions in light of the PBP not providing specifications for data centres. How and why did it assume 29kW/m² given the scale and proximity to a direct fire run? The difference between the assumptions is in the provisioning of an appropriate APZ to enable firefighting. Given the combustible storage locations, generator placement along the fire run, this should be higher requiring a greater setback to provide safe firefighting provision. Under this assumption the distance ranges from 11-30mtrs which the Architectural report stated it could not provide. The proposed APZ is 20mtrs (south end) however is provided as 'commensurate with the construction of the building; and a defendable space' - this will not adequately provide safe space for fighting. 	<p>No natural gas is used in the proposed development, full electrification as prescribed by the amended Infrastructure Delivery, Management & Staging Plan.</p> <p>The facade material is constructed from reinforced concrete and other non-combustible materials, ensuring compliance with bushfire safety requirements and minimizing ignition risk.</p> <p>Additionally, the facade finish incorporates a matte surface treatment to reduce reflectivity and glare, mitigating environmental impacts while maintaining aesthetic integration with the surrounding landscape.</p>	<p>Architectural Design Report (Appendix DD3) Infrastructure Delivery, Management & Staging Plan (Appendix DD29) Bushfire Assessment (Appendix DD30)</p>



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Key Issues	Response	Supporting Appendix / Section
<p>5.4. Vegetation Management Plan</p> <p>Council notes that Appendix 15 requires a Vegetation Management Plan (VMP) be prepared for the development. Council recommends that on condition of consent, the applicant be required to prepare a detailed VMP.</p> <p>Council notes that there is an existing VMP and Bushland Management Plan that applies to the site as associated with the Previous Approval. It's recommended that any new VMP consider and incorporate the previous requirements of into a new VMP. Any VMP should address the following: Council will provide a recommended condition of consent at a later date to address this matter</p>	<p>Noted.</p>	<p>N/A</p>
<p>5.5. Landscaping, Pedestrian access and land management</p> <p>The site directly adjoins the Lane Cove National Park to the east and south-east which contains a walking track known as The Great North Walk and a fire trail. The site includes significant rock formations, canopy trees, rock outcrops and established vegetation. Council previously requested that the Applicant maintain the existing pedestrian access and upgrade the walking tracks and steps without impacting negatively on the adjoining native vegetation.</p> <p>Council suggests that:</p> <ul style="list-style-type: none"> • The landscape plan needs to clearly include these elements from the Survey Plan. • The actual walking track / path route (across the site) needs better clarification/confirmation. • The proposed access from the property into Lane Cove National Park. Proponent is to provide further information on how they see this access path working and extending from Julius Avenue and how they expect people to move from the property into the reserve safely and without creating a CPTED or maintenance issue for Council or National Parks. • The plans should show how an accessible route / cross section and grades are achieved from Julius Avenue to the access road <p>Additionally, Council requires details on how the boardwalk and landscaped setting will be maintained in perpetuity. Council will not accept dedication of this land/ accept maintenance responsibilities, therefore being the responsibility of the owner of the site.</p> <p>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. It is requested that any proposed landscaping infrastructure that will impact trees and existing vegetation is minimised.</p> <p>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, and to improve the existing track.</p> <p>On RTS Submission the applicant must provide appropriate details of land management of this space. It is recommended that an Operational Place Strategy Management Plan (OPSMP) be prepared that details:</p> <ul style="list-style-type: none"> • Detail how adequate levels of service and maintenance occur of these spaces • Detail capital funding models of operations and maintenance of these spaces • Provide clear risk & liability strategy of these spaces • Provide details and responsibilities and processing complaints of these spaces • Provide details on the operation and use of these spaces • Provide a clear governance strategy for the accessible areas • Provide clear risk mitigation strategies for natural events (such as flooding, bushfire and more) 	<p>Refer to the amended Landscape Drawings and Report which has incorporated such commentary where relevant (acknowledging that the western pedestrian link has been removed).</p>	<p>Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)</p>
<p>6.1. Stormwater Management</p> <p>In review of the EIS Council provides the following comments:</p> <ul style="list-style-type: none"> • The hydraulic services report indicates the system is to incorporate a 230kL size rainwater tank system which will greatly reduce the degree of runoff being discharged from the site and is a commendable component of the stormwater management system. • In comparison to the original concept plans, the number of dispersal points have been increased and are integrated into the landscape design. This is aligned with the general stormwater objective for this project, which is to ensure that the dispersal of flow to the National Park land is achieved in a manner which mimics state of nature conditions. <p>The following matters warrant further information or are to be addressed;</p> <ul style="list-style-type: none"> • The nominated OSD design rational has implemented a strict interpretation of the Council's DCP requirements for OSD systems. Whilst this is technically correct, it is not considered appropriate for the location of the development, means of discharge (dispersal outlet) and scale of development. 	<p>The amended scope of development has greatly reduced the water demand on the site and the reduction in building footprint.</p> <p>DRAINS modelling has been provided alongside this amendment.</p>	<p>Civil Engineering Report (Appendix DD21)</p>



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<p>Noting the design should mimic "state of nature" conditions. In other words, the rate of runoff being discharged to the outlets should replicate how it would be if the site were in an undeveloped state (ie natural, vegetated, bushland).</p> <ul style="list-style-type: none"> The provided Civil Engineering Report (concerning stormwater) has presented results of the OSD design utilising DRAINS modelling software but has not provided the data files for review and correlation. Council requires the DRAINS data files be provided for further review. The location of the northern most dispersal point is noted to be upstream of private land (above where the parking is to be relocated). The location is a very poor arrangement given it will likely be detrimental to the downstream area and therefore should be relocated further south or potentially discharge to the same service addressing flood mitigation. There is a stormwater drainage easement located adjoining the northern boundary which the works will impose upon. It is advised that the planning authority confer with the beneficiary of the easement and confirm they have no objection with the works encroaching over this area. 		
<p>6.2. Vehicle access, parking and servicing facilities</p> <p>In review of the EIS Council provides the following comments:</p> <ul style="list-style-type: none"> The proposed new access road displaces parking located in the cul-de-sac of Richardson Place. The proposed civil plans have indicated this displaced parking will be relocated to the neighboring site (3 Richardson Place) in a new parking area. The configuration will require the consent of this land owner. It is also suspected that this portion of land may be subject to inundation or adjoining the floodway anticipated to arise from extreme storm events and therefore the matter should be included in the proposals flood report. The swept path analysis has maintained a MRV vehicle however the logistics of construction will likely warrant access by AV. This design vehicle should be considered and additional information be provided on the largest vehicle that will access the site. <p>Council notes that the development will result in works required to 3 Richardson Avenue because of the access road and having to relocate/ amend parking bays. It's understood that the applicant intends to lodge a Local DA to Council for the associated works to 3 Richardson Avenue. Council recommends that DPHI impose a condition that requires the benefiter of the SSD consent obtain owners consent and lodge a DA to Council to resolve the parking</p>	<p>The development no longer proposes an extension to Richardson Place, thus alleviating any potential displacement to existing cul-de-sac parking arrangements.</p> <p>The CTMP details AV routes within as the largest vehicle accessing the subject site.</p>	<p>Transport Impact & Accessibility Impact Report (Appendix DD8) Construction Traffic Management Plan (Appendix DD9)</p>
<p>7.1. Revision of Stormwater plans</p> <p>Council recommends that the Stormwater plans (Revision D) prepared by TTW Pty Ltd dated 11 July 2025 are to be revised noting that Richardson Place is currently a private road; therefore, a proposed pipe system within a privately owned road cannot be supported without the asset owner's authority. It is recommended that the Applicant revise the design to:</p> <ul style="list-style-type: none"> Indicate the ownership of the proposed access road on the plans. Council's preference is for this road to be maintained by private owners, as it services only this development. Council will not accept maintenance responsibility for the OSD system. Indicate the existing Council drainage assets with a different layer. There are some details such as the existing pit on the Richardson place corner missing on the plan. Owners consent would be required from 3 Richardson Avenue to propose works within their lot. <p>Upgrading of Council drainage assets:</p> <p>The following details shall be provided concerning the proposed stormwater upgrades:</p> <ul style="list-style-type: none"> Longitudinal Section to be provided and shall be cover compliant as per City of Ryde DCP 2014 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). The pipe long section shall also include hydraulic grade line analysis. Pipes to include Rubber ring joints Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plans, including details of the connection of the proposed stormwater system. Minimum 1% slope to be provided for new drainage lines in Council land and street. The proposed stormwater pipes shall maintain adequate horizontal and vertical clearances from adjacent utilities as per relevant utility authority requirements. Approval from relevant utility authority may be required with regards to clearances. Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plans, including details of the connection with the proposed stormwater system. Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plans. Note: Please use Council asset numbers. <p>Council recommends that the Flood impact and risk assessment prepared by TTW Pty Ltd dated 20 June 2025 is to be revised and reflect the following:</p> <ul style="list-style-type: none"> 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 and PMF in .asc format shall be submitted. 	<p>Refer to the amended Civil Engineering Plan and Flood Impact Risk Assessment.</p>	<p>Civil Engineering Report (Appendix DD21) Flood Impact Risk Assessment (Appendix DD22)</p>



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<ul style="list-style-type: none"> Please explain the assumption for the blockage scenario. It is unclear whether any blockage factors for the proposed drainage infrastructure have been implemented. Provide high-resolution flood maps with appropriate quality intervals: <ul style="list-style-type: none"> Flood levels to be shown inside and outside the development site, including neighbouring properties, at a 0.2 m contour interval. Flood level afflux maps for the 1% AEP and PMF events at 0.01-0.02 m. VxD maps at 0.2 m²/s intervals. VD afflux map is not provided. Please provide VxD afflux map at 0.04-0.05 m²/s interval in the flood study report. Please describe the flood level impact and VD impact inside and outside the development site due to proposed development in the report. Please include existing scenario modelled flood levels for both the 1% AEP and PMF events. <p>The existing Council flood maps indicates that the site is 100% inundated by PMF flood. Please note that reference must be made to the existing flood maps, as the draft flood study is not yet legally gazetted. Accordingly, the following highlighted statement must be revised in line with existing flood mapping: For this site, the Flood Planning Level has been set based on either the maximum PMF flood level or the 1% AEP flood level plus 300 mm, whichever is higher, in line with industry-accepted practice. The basement entry is located on the southern side of the proposed development and is not affected by flooding.</p> <p>The proposed development will include basement car parking and tank rooms, two data halls, an electricity generation gantry designed to accommodate 12 generator units, a loading dock, associated landscaping, an access road connecting the existing road to the west with the Richardson Place cul-de-sac to the east, and a separate Ausgrid Sub-Transmission Switching Station (STSS) along with a main switchboard room.</p> <p>As the site is affected by PMF, the architectural plans will require amendment to address the following points:</p> <ul style="list-style-type: none"> Basement Ramp/opening to raise to PMF level before descending to the basement to ensure basement flood immunity. A cross section of the basement ramp/opening to be provided and clearly demonstrate that the crest of the basement ramp is designed up to PMF level. Any other opening leading to the basement (e.g. emergency exits, vents, etc.) to be located above PMF. Please provide the certificate from the flood engineer that the proposed basement openings are not inundated during PMF flood event 		
<p>8.1. Public Domain Works to be Completed along the Frontages of the Site</p> <p>Council requests that the Applicant provides 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.</p> <p>As mentioned in previous advice, works will include but are not necessarily limited to:</p> <ul style="list-style-type: none"> 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 	<p>Landscape documentation addresses works within the property boundary only. Public domain elements such as street trees, bus stops, overhead cables, and additional street furniture are not applicable to the existing site conditions and will be subject to a separate application, if required.</p>	<p>Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)</p>
<p>8.2. Roads / Street network</p> <p>Council and the applicant have had detailed discussions on the matter regarding road dedication. Noting Council's Previous EIS Advice, the applicant has agreed to keep all roads in private ownership. This being the case, Council consider the variation to the design guide as acceptable, given they are not proposed to be dedicated to Council.</p> <p>DPHI can refer to Council's position as stated in its pre-DA advice.</p> <p><u>Connection with Future Road with Existing Private Road.</u> 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. 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 the 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.</p>	<p>This item is no longer considered applicable due to the extension of Richardson Place being removed from the scope of works.</p>	<p>N/A</p>



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<p>Council requests that the following information is provided to facilitate assessment:</p> <ul style="list-style-type: none"> Public domain plan detailing the scope of public domain upgrade works to be delivered on existing road frontages should include the specified widths and layouts of the new roads within the site. 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. <p>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.</p>		
<p>8.3. Management of Subsurface Utilities</p> <p>The pre-EIS advice provided by Council requested that the applicant consider mitigation strategies to prevent dilapidation of public domain infrastructure resulting from the large volumes of communications utility installations generally installed following commencement operation. It should be emphasised that the main concern is not the pre-occupation installation of supporting utility infrastructure, but rather the requirement for telecommunication authorities connection to the site, to expand, modify or upgrade their subsurface infrastructure within the vicinity of the data centre, following commencement of operation.</p> <p>The applicant has provided a comprehensive Infrastructure Plan (appendix 29) which details a Concept Communications plans including lead in conduit routes. As part of the Macquarie Park Public Domain Strategy Report, a utility management policy is proposed to be implemented to offset the impacts of new data centres on public domain infrastructure. It is anticipated that this policy will require a number of spare conduits to be installed along the frontage of a data centre development site and to a relevant point where existing communications utilities infrastructure can be connected. The final arrangement and extent of spare conduits to be provided will be subject to demonstrated consultation with utility authorities. No further information is required from the applicant at this point, and this issue can be appropriately conditioned.</p>	Noted	N/A
<p>9. Traffic, vehicle access and parking</p> <p>Council has considered the EIS and provides the following comments to be addressed. Council notes that these matters were raised in its Pre-EIS advice however have not been addressed in the exhibited proposal.</p> <ul style="list-style-type: none"> 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. 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 applicant 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 swept path plans in the TIA report 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. In addition to the above, it is noted that 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 applicant must provide evidence that the roadway, including the cul-de-sac, is legally accessible for public use. 	An amended Transport Impact & Accessibility Impact Report has incorporated the items specified alongside.	Transport Impact & Accessibility Impact Report (Appendix DD8)



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<p>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.</p> <ul style="list-style-type: none"> The submitted letter of offer indicates that the applicant proposes to dedicate the new internal road along the southern portion of the site to Council if requested by Council or otherwise provide a public access easement prior to the first Occupation Certificate. However, the dedication of the new internal road is not supported, as the road lacks traffic functionality and does not offer any discernible public benefit. It is therefore recommended that the letter of offer be amended to remove the road dedication and to indicate that a public access easement associated with the new internal road will be provided prior to the first Occupation Certificate 		
<p>10. Environmental Health</p> <p>Council's Environmental Health staff have undertaken a detailed review of the relevant SSD application expert reports. Council has considered the proposal from several environmental health perspectives and is generally supportive of the application subject to recommended conditions of consent that can be provided to DPHI at a later date.</p> <p>10.1. Other Environmental Considerations</p> <p>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.</p> <p>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. Macquarie Park is subject to significant wind impact and large buildings require detailed assessments (pedestrian environment and wind tunnel studies) as per the Ryde DCP 4.5 Macquarie Park Section 9.1. Without an adequate assessment of impact, the consent authority cannot be satisfied that the development impact on wind and the ground plane is acceptable.</p> <p>Council previously advised this was required in its EIS advice however it was not provided</p>	<p>The Wind Study undertaken has been appended alongside this amendment.</p>	<p>Wind Study (Appendix DD35)</p>
<p>Conclusion</p> <p>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 subject to receipt of further information outlined in this submission. Council thanks the applicant for their detailed engagement prior to lodgement of their EIS. This submission outlines that there are still outstanding matters to be addressed and welcomes the opportunity to further collaboratively engage with the applicant to resolve these matters.</p> <p>Council will be able to provide recommended conditions of consent to DPHI at a later date.</p> <p>As outlined above as the Applicant is relying on Clause 7.7 for incentive height, and the proposal has been designed as such, it is important that the applicant progresses the Voluntary Planning Agreement (VPA) and that the application not be determined until such agreement is finalised.</p> <p>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.</p>	<p>Noted</p>	<p>N/A</p>
<p>Willoughby Council</p>		
<p>1. Appropriate Plans of Construction Management</p> <p>The site of this development is directly adjacent to the Lane Cove River, an important and environmentally sensitive waterway. Council considers it essential that construction activities be carefully managed to prevent any adverse impacts. Accordingly, the following measures are expected to be conditioned:</p> <ul style="list-style-type: none"> Council expects the proponent to have an appropriate Construction Management Plan to ensure erosion, sediment and runoff does not occur on the adjoining environmental conservation area and Lane Cove River. Moreover, the stockpile and laydown of machinery and materials are to be strictly within site boundaries and placed in appropriate areas, with established fencing and exclusion zones that protect adjoining bushland. Implemented controls such as monitoring, incident reporting and stop-work protocols to ensure rapid response in the event of environmental control failures. 	<p>Noted</p>	<p>N/A</p>
<p>2. New Path to Great North Walk</p> <p>Consultation should be undertaken with the NSW National Parks and Wildlife Service and the City of Ryde Council, as they are responsible for managing sections of the Great North Walk trail. Key considerations include ensuring that the proposed path connection is compatible with the existing trail network, and whether public access to the Great North Walk can be safely maintained throughout the construction period.</p>	<p>No work is undertaken in the area of concern. Furthermore, the western pedestrian link previously provided has been removed.</p>	
<p>3. Design Excellence of Proposed Data Centre</p>	<p>Noted</p>	<p>N/A</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>It is considered reasonable for the proposed development to achieve design excellence reflective of its context. The Environmental Impact Statement (EIS) prepared with the SSD application lists a number of objectives regarding high quality design, sustainability and landscaping. The Department should ensure these objectives are achieved and sustainable for the life of the development.</p>		
<p>4. Lighting Impacts on Lane Cove River and Local Fauna Given the site's proximity to the Lane Cove River and surrounding environmentally sensitive landscape, the Data Centre lighting should be kept to a minimum as the structure presents and is visible to the Lane Cove River. An appropriate relationship with the Lane Cove River is sought at night, with lighting having minimal impacts on local fauna. The proposal contains general lighting to the entry point and car parking areas that is located to the southern side of the site. This functional lighting at a ground / low level should not increase light spill to surrounding sensitive areas. Decorative and identification lighting to the building structure, which would be visible to bushland and the Lane Cove River at night, is not supported.</p>	<p>Noted. No uplighting or perimeter lighting is proposed, mitigating interferences surrounding sensitive areas.</p>	<p>Architectural Plans (Appendix DD2)</p>
<p>Sydney Water</p>		
<p>Water Servicing</p> <ul style="list-style-type: none"> • Our preliminary assessment indicates that water servicing should be available for the proposed development. • The proponent will however be required to carry out an options and hydraulic assessment due to the significant demand created by the proposed development. • Amplifications, adjustments, deviations and/or minor extensions will likely be required following the outcomes from the hydraulic modelling and options assessment. • The development will be required to comply with Sydney Water's draft Data Centre Planning Policy, which includes (but is not limited to) the following terms: <ul style="list-style-type: none"> ○ The developer will receive up to the average day demand from Sydney Waters' potable water system. ○ The developer will need to accommodate daily variations in demand and any demand required for peak demand by providing internal reservoir storage as part of the development design. ○ The proponent is to note that Sydney Water will not reserve any capacity in the network system (i.e. reserve storage in reservoirs for emergency use.) 	<p>Water demand has reduced by approximately 2,250 million litres per year, from 2,258 million litres per year to 7.2 million litres per year (99.7% reduction through the revised development.</p> <p>The remainder of items has been acknowledged.</p>	<p>Infrastructure Delivery, Management & Staging Plan (Appendix DD29)</p>
<p>Wastewater Servicing</p> <ul style="list-style-type: none"> • Our preliminary assessment indicates that wastewater servicing should be available for the proposed development. • If modifications occur to indicated wastewater demand prior to the issue of a Section 73 Compliance Certificate, the proponent will be required to reapply. • Amplifications, adjustments, deviations and/or minor extensions may be required. 	<p>Noted</p>	<p>N/A</p>
<p>Next steps</p> <ul style="list-style-type: none"> • Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. <ul style="list-style-type: none"> ○ Section 73 Compliance Certificate ○ Building Plan Approval Further details of the conditions can be found in Attachment 1. • The proponent should continue to liaise with Sydney Water under their existing Section 73 application, CN225513. • The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions. <p>This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.</p> <p>Please note that the available capacity may change over time depending on the rate of development and increased demand elsewhere in the potable water and wastewater catchments. Sydney Water does not reserve capacity pre-development and it is advised that the proponent applies directly to Sydney Water for a Section 73 Compliance Certificate as soon as feasible.</p> <p>The Department can read further advice on requirements for this proposal in Attachments 1 and 2. If the proponent has any questions, they should contact their Sydney Water case manager. Should the Department require further information, please contact Fiona Feng from the Growth Analytics Team at urbangrowth@sydneywater.com.au.</p> <p>Attachment 1 - Recommended Development Conditions</p> <p><u>Prior to the issue of an Occupation/Subdivision Certificate:</u></p>	<p>Noted</p>	<p>N/A</p>



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<p><u>Section 73 Compliance Certificate</u></p> <p>A compliance certificate must be obtained from Sydney Water, under Section 73 of the Sydney Water Act 1994. Our assessment will determine the availability of water and wastewater services, which may require extensions, adjustments, or connections to our mains. Make an early application for the certificate, as there may be assets to be built and this can take some time. A Section 73 Compliance Certificate must be obtained before an Occupation or Subdivision Certificate will be issued.</p> <p>Applications can be made either directly to Sydney Water or through a Sydney Water accredited Water Servicing Coordinator.</p> <p>Go to the Sydney Water website or call 1300 082 746 to learn more about applying through an authorised WSC or Sydney Water.</p> <p><u>Prior to the issue of a Construction Certificate/Complying Development Certificate:</u> <u>Building Plan Approval (including Tree Planting Guidelines)</u></p> <p>The plans must be approved by Sydney Water prior to demolition, excavation or construction works commencing. This allows Sydney Water to determine if sewer, water or stormwater mains or easements will be affected by any part of your development. Any amendments to plans will require re-approval. Please go to Sydney Water Tap in© to apply.</p> <p>Sydney Water recommends developers apply for a Building Plan Approval early as to reduce unnecessary delays to further referrals or development timescales.</p> <p><u>Tree Planting</u></p> <p>Certain tree species placed in proximity to Sydney Water's underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Section 46 of the Sydney Water Act specifies what might occur when there is interference or damage to our assets caused by trees.</p> <p>For any trees proposed or planted that may cause destruction of, damage to or interference with our work and are in breach of the Sydney Water Act 1994, Sydney Water may issue an order to remove that tree or directly remove it and seek recovery for all loss and associated compensation for the removal.</p> <p>For guidance on types of trees that can cause damage or interference with our assets see Sydney Water webpage Wastewater blockages. For guidance on how to plant trees near our assets, see Diagram 5 - Planting Trees within Sydney Water's Technical guidelines - Building over and adjacent to pipe assets.</p> <p>Attachment 2 - Sydney Water Requirements for Commercial and Industrial Developments (for proponent's information)</p> <p><u>Trade Wastewater Requirements</u></p> <p>If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission. The permit application should be emailed to Sydney Water's Business Customer Services at businesscustomers@sydneywater.com.au</p> <p>A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.</p> <p>If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.</p> <p><u>Backflow Prevention Requirements</u></p> <p>Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.</p> <p>All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.</p> <p>Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.</p> <p>Before you install a backflow prevention device:</p> <ol style="list-style-type: none"> 1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements. 2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099. 		



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<p>For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website: https://www.sydneywater.com.au/plumbing-building-developing/plumbing/backflow-prevention.html</p> <p><u>Water Efficiency Recommendations</u></p> <p>Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment. Some water efficiency measures that can be easily implemented in your business are:</p> <ul style="list-style-type: none"> • Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, http://www.waterrating.gov.au/ • Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to https://www.sydneywater.com.au/your-business/managing-your-water-use/water-efficiency-tips.html • Install water-monitoring devices on your meter to identify water usage patterns and leaks. • Develop a water efficiency plan for your business. <p>It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.</p> <p><u>Contingency Plan Recommendations</u></p> <p>Under Sydney Water's customer contract Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.</p> <p>Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned. Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority. Have you thought about a contingency plan for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption. For further information please visit the Sydney Water website at: https://www.sydneywater.com.au/your-business/managing-trade-wastewater/commercial-trade-wastewater.html or contact Business Customer Services at businesscustomers@sydneywater.com.au.</p>		
Transport for NSW (TfNSW)		
<p>Thank you for referring the Environmental Impact Statement (EIS) for the abovementioned State Significant Development Application (SSDA) to Transport for NSW (TfNSW) for review and comment.</p> <p>TfNSW has reviewed the EIS and advises that the Agency has no requirements as the proposed development is unlikely to have a significant impact on the classified road network.</p> <p>Should you have any further inquiries in relation to this matter, please do not hesitate to contact Hans Pilly Mootanah, Land Use Planner on 0428 391 997 or by email at development.sydney@transport.nsw.gov.au.</p>	Noted	N/A
NSW Rural Fire Service (NSW RFS)		
<p>Reference is made to correspondence dated 29/07/2025 seeking comments regarding the Environmental Impact Statement (EIS) currently being exhibited, for the above State Significant Development in accordance with the Environmental Planning and Assessment Act 1979.</p> <p>The New South Wales Rural Fire Service (NSW RFS) has reviewed the EIS and provides the following comments; The Bush Fire Assessment Report (Prepared by Bushfire Hazard Solutions, Dated 21.05.2025, Ref: 250413B) has addressed the requirements of Section 8.3.10 and 8.3.1 of Planning for Bush Fire Protection 2019. The NSW RFS raises no additional concerns to the proposal progressing subject to adoption of recommendations of section 8 of the above referenced report.</p>	Noted, however reference is made to the amended Bushfire Assessment for consideration.	Bushfire Assessment (Appendix DD30)
Fire & Rescue NSW (FRNSW)		
<p>Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 29 July 2025, requesting advice on the EIS for JULIUS AVENUE DATA CENTRE - 6-8 JULIUS AVENUE, NORTH RYDE (SSD-80018208). FRNSW have reviewed the EIS with particular focus to Appendix 23, Preliminary Hazards Analysis (PHA). The EIS details a Data Centre with Battery Energy Storage. It has been the experience of FRNSW that Data Centres present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹. FRNSW therefore recommend the following conditions:</p> <ol style="list-style-type: none"> 1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.2² and submitted to FRNSW for review. • The FSS is to be used to guide the design and as such it is FRNSW Position³ that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). • The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets⁴. 	Noted (FSS will be submitted post approval).	N/A



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Key Issues	Response	Supporting Appendix / Section
<p>2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1⁵.</p> <p>3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans⁶.</p>		
NSW National Parks and Wildlife Services (NSW NPWS)		
<p>1. Habitat fragmentation, extensive clearing and ecological impacts</p> <p>NPWS has reviewed the EIS and Appendix 15 – Biodiversity Development Assessment Report, prepared by SLR Consulting dated 28 May 2025 (BDAR).</p> <p>Section 3.3.1.3 of the EIS confirms that a total of 509 mature trees will be removed from the site, as they are within the proposed works footprint or will be significantly impacted by the works. The BDAR confirms that the southern portion of the site exhibits habitat connectivity to the adjoining Lane Cove National Park (Figure 1). The BDAR further confirms that the Sydney Coastal Enriched Sandstone Forest plant community type is recorded on the site totalling 1.78 hectares.</p> <p>NPWS highlights that the Sydney Coastal Enriched Sandstone Forest is an important contributor to the local ecosystem in Lane Cove National Park and provides foraging habitat for various locally occurring threatened species including the Swift Parrot and Grey-headed Flying-fox. NPWS is concerned that the removal of native vegetation will result in habitat fragmentation by reducing the availability of suitable foraging habitat for local threatened species. The removal of 509 trees on the site will increase pressure on existing hollows and perching habitat within the adjoining park. This will result in a net reduction of suitable habitat for threatened species.</p> <p>The extent of native vegetation removal is significant, and it is the view of NPWS that the proposed addition of 143 new trees is not sufficient to provide suitable habitat for local threatened species.</p> <p>The location of the site is between two important Coastal Swamp Oak (<i>Casuarina glauca</i>) Wetlands within Lane Cove National Park. Connectivity between these areas is critical for powerful owls nesting in both areas, and the Australasian Bittern which is endangered under the EPBC Act. NPWS is concerned that light spill from the development, exacerbated by the extensive clearing on site, will impact on fauna movement between these two areas.</p> <p>Recommendations: As part of the RTS, the following is recommended for action by the proponent:</p> <ul style="list-style-type: none"> Habitat connectivity is considered and maintained to the greatest extent practicable supporting retained vegetation to sustain linkages for threatened species and native vegetation within Lane Cove National Park. Undertake an assessment of light spill associated with the development and its impact on the adjoining park, with specific consideration of threatened fauna movement within the corridor. 	<p>The development has been amended to retain considerable amounts of vegetation, particularly on lands adjacent to Lane Cove National Park. This includes the removal of a pedestrian linkage to the west of the subject site, with a priority of vegetation retention instead adopted. Further, there was no identified bat activity in sandstone forest plant communities within the subject site.</p> <p>The amended BDAR has considered lighting provisions in its assessment.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>2. Ausgrid substation (on-site)</p> <p>The EIS notes that the proposed development will include future construction of an Ausgrid 132 kilovolt (kV) Sub-transmission Switching Station (STSS), which will form part of a separate approval. NPWS acknowledges that the provision of the STSS, including tree removal, civil works, access and servicing, is assessed as part of the EIS. Nonetheless, given the separate approval pathway, NPWS is concerned that the footprint of the STSS may change and warrant additional vegetation clearing within the site. NPWS is aware that the STSS will likely require a cleared perimeter (approximately 5m wide) for access, servicing and hazard reduction.</p> <p>Section 3.3.2.2 of EIS notes that the new STSS will supply the data centre via underground cabling conduits, and internal risers to the transformer rooms. It is however unclear how Ausgrid intends to supply the STSS with electricity from the grid, nor whether the new infrastructure will exclusively service the data centre.</p> <p>NPWS highlights that a 132 kV overhead transmission line transects Lane Cove National Park to the south of the site, and any augmentation to this infrastructure will impact the park and be of interest to NPWS. As discussed at the Pre-consultation Meeting on 17 April 2025, it is of strong preference to NPWS that any power supply to the future STSS is facilitated via Julius Avenue to the north to avoid environmental risk and impacts to Lane Cove National Park.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> Early consultation with NPWS via npws.northwesternsydney@environment.nsw.gov.au regarding the STSS proposal and acknowledgement that any future works within Lane Cove National Park will be subject to the requirements of the NSW National Parks and Wildlife Act 1974. As part of the RTS, undertake a cumulative assessment impacts associated with the proposed substation, including any associated clearing (including grid connection), construction access, Asset Protection Zone (APZ) and ongoing management for the asset. 	<p>As previously identified within this table, the STSS will service the broader precinct. The scope of development has been revised to negate previous impacts to Lane Cove National Park.</p>	<p>Infrastructure Delivery, Management & Staging Plan (Appendix DD29)</p>
<p>3. Data cable connections</p>	<p>Details on the items specified alongside are contained within the</p>	<p>Infrastructure Delivery, Management & Staging Plan (Appendix DD29)</p>



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<p>The EIS does not provide any information regarding the data connections required for the operation of the data centre. Table 8 of the EIS outlines power and water connections being required, but no comment on data connections.</p> <p>The proposal is located within an existing industrial area which is surrounded by operational data centres that utilise underground cable connections located under the riverbed of Lane Cove River. This poses a significant risk for NPWS given directional drilling and excavation required for both construction and operational maintenance.</p> <p>It is unclear whether the proposed data centre will rely on existing data connections or if, as part of its operations, additional data cabling connections will be required. If the latter, the EIS should provide an assessment of the cumulative impact of any proposed data connections, with a specific consideration of the adequacy of the existing cabling network through the Lane Cove National Park or if there are plans to augment the existing network through the park.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> • Provides details of the data connections required for the operation of the data centre, including any augmentations to existing infrastructure and new network cables • Undertakes a cumulative impact assessment of these data connections, including a consideration of any potential construction impacts (including directional drilling and excavation) and details of ongoing operational maintenance, particularly for any cables that transect Lane Cove National Park and the riverbed of Lane Cove River. 	<p>amended Infrastructure Delivery, Management & Staging Plan</p>	
<p>4. Bushfire management</p> <p>NPWS has reviewed the Bushfire Assessment Report, prepared by Building Code & Bushfire Hazard Solutions Pty Ltd dated 21 May 2025 (BAR). The site and surrounds, including Lane Cove National Park, contain designated Bushfire Prone Land.</p> <p>As noted in the BAR, the proposal cannot provide the minimum Asset Protection Zone (APZ) in accordance with the Planning for Bush Fire Protection 2019 (PBP) due to the presence of significant vegetation on site. The proposal must therefore demonstrate compliance with the Performance Criteria within Table 7.4a of the PBP by providing a 'defendable space' for attending fire services.</p> <p>NPWS has reviewed the APZ Overlay (Attachment 1) of the BAR and questions the suitability of the proposed APZs in protecting the adjoining park from bushfire in the event of infrastructure or equipment failure on site. The APZ Overlay demonstrates that the data centre building and generators provide a minimum separation of ~90m and ~55m from the park boundary respectfully yet does not consider the ignition risk of the future STSS.</p> <p>NPWS is concerned that this separation to the park boundary will be compromised by the construction of the future STSS. Despite the STSS not forming part of this application, NPWS questions the suitability of the proposed APZs as the STSS may provide a future ignition source in the event of failure. Therefore, NPWS is uncertain whether the data centre building and generators can demonstrate compliance with APZ requirements of the PBP upon construction of the STSS.</p> <p>Further, the proposed STSS footprint only provides a minimum 7m setback to the adjoining site at 3 Richardson Place, which contains a heavily vegetated corridor in the southwestern corner which connects to Lane Cove National Park. Given the STSS footprint is not confirmed in this application, NPWS also flags that this separation may be reduced and pose an increased fire risk to the park.</p> <p>Any future APZs must satisfy the requirements of the PBP, and be maintained wholly within the development site. The firm position of NPWS is that consent authorities should not grant approvals that will necessitate bush fire hazard reduction works within NPWS land, including the establishment of APZs, or include conditions requiring such an outcome. The burdening of conservation lands with the requirement for APZs is contrary to PBP and is not permissible under the NPW Act.</p> <p>NPWS maintains a fire trail that is accessed via the adjoining site at 3 Richardson Place and passes through the site. This fire trail is deemed a 'Tactical Fire Trail' in accordance with the NSW RFS Fire Trail Standards and may be used by NPWS to support the prevention and suppression of fire. It provided key strategic access for NPWS in the management of the 2011 wildfire that threatened properties along Julius Avenue.</p> <p>On review of the Landscape Plans, prepared by Arcadia dated 2 May 2025, it is unclear whether this fire trail has been removed, or is shifted towards the middle of the site to connect via The Great North Walk.</p> <p>NPWS would like to confirm the purpose of this trail, and whether vehicle access is intended. It is a concern for NPWS if vehicle access to the park will be removed as it is the only management access within the vicinity. NPWS would like to confirm the specifications of the proposed trail to ensure it is suitable for NPWS vehicles including Category 1 Fire Appliances.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p>	<p>The development has yielded support from the NSW Rural Fire Service (RFS), with further detail on APZs provided through an amended Bushfire Assessment.</p> <p>Further, as reiterated throughout this amendment, the scope of works no longer includes an extension of Richardson Place, allowing fire trail access to remain unimpeded.</p>	<p>Bushfire Assessment (Appendix DD30)</p>



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<ul style="list-style-type: none"> Undertake additional assessment of the APZ and bushfire management requirements for the future STSS in accordance with the PBP. NPWS would like to confirm that the proposed APZ for the data centre and generators will not be compromised by the future STSS, and Lane Cove National Park will not be burdened by increased bushfire risk or any need to allow for APZs to be established in the park. Confirm the suitability of the management trail for NPWS use by assessing accessibility against the RFS Planning for Bushfire Protection 2019 and NSW Fire Trail Standards (November 2023). 		
<p>5. Interface and public use of Lane Cove National Park</p> <p>NPWS appreciates the provision of two new pedestrian links through the site to Lane Cove National Park and the Great North Walk with associated signage.</p> <p>On review of the EIS, NPWS is concerned that the EIS fails to consider potential amenity impacts to users of Lane Cove National Park, including visitors to the Great North Walk.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> Ensure the new boundary signage to reflect change of tenure to ensure that the public are aware of regulations associated with visitation, including no dogs being allowed within the park. Please consult with the NPWS via npws.northwesternsydney@environment.nsw.gov.au to determine appropriate signage. Undertake an assessment of any public amenity impacts (such as noise, visual and odour) from within Lane Cove National Park, including from the Great North Walk. 	<p>Signage details have been provided within the Landscape Report.</p>	<p>Landscape Report (Appendix DD12)</p>
<p>6. Flood impact risk assessment</p> <p>NPWS has reviewed the Flood Impact Risk Assessment (FIRA) prepared by Taylor Thomson Whitting dated 20 June 2025.</p> <p>NPWS is concerned that the scope of the FIRA does not consider potential impacts to Lane Cove National Park as the flood modelling stops at the vegetation line, which fails to quantify flood risk within the southern section of the site abutting park. The FIRA also does not quantify the impacts associated with the cleared area for the future substation, which will inherently increase impervious surfaces within the southern area and potential for increased overland flows towards the park boundary.</p> <p>As indicated in the Stormwater Layout Plan, two new drainage lines, identified as flood diversion infrastructure pipes, are proposed on the eastern and western sides of the site and will discharge into the southern area of the site. As the flood modelling does not quantify the existing and future conditions for the entirety of the site, NPWS is unable to understand the extent of impacts to the adjoining park arising from these new drainage lines.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> Undertake additional flood modelling to cover the entirety of the site, with specific consideration of implications associated with the extensive vegetation clearing in the southern portion of the site. Quantify the extent of flood impacts to the downstream sensitive receiving environment that is Lane Cove National Park. 	<p>An amended Flood Impact Risk Assessment has been prepared encapsulating items specified alongside.</p>	<p>Flood Impact Risk Assessment (Appendix DD22)</p>
<p>7. Stormwater discharge</p> <p>NPWS has reviewed the Civil Engineering Report Incorporating Water Management Plan, prepared by Taylor Thomson Whitting dated 11 July 2025.</p> <p>NPWS understands that proposed stormwater scheme has been designed in accordance with the City of Ryde DCP 2014 and the Stormwater Management Technical Manual 2014. There is provision for two (2) OSD tanks, with one discharge towards the southwest side of the proposed access road and one to the south of the STSS footprint. Overflow will be directed into the southern portion of the site, and towards the sensitive receiving environment of Lane Cove National Park.</p> <p>By nature of the proposed use, NPWS is concerned that stormwater run-off may be contaminated with dust, chemicals, minerals and other detrimental material. NPWS recognises the proposed stormwater treatments will include the combination of a rainwater reuse tank, pit insert filter baskets and filtration cartridges, but questions whether these measures are sufficient to achieve best practice Water Sensitive Urban Design (WSUD) guidance. NPWS understands that filtration cartridges can only address pollution if correctly maintained, and therefore questions whether it will provide suitable mitigation in avoiding impacts to the park.</p>	<p>OSD tank to be fitted with isolation gate valve for isolation of site discharge under FRNSW operational conditions. This is a requirement of "best practice guidelines for contaminated water retention and treatment systems" guideline referenced by DPHI.</p>	<p>Civil Engineering Report (Appendix DD21)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>The extensive clearing in the southern area, NPWS highlights the potential for large uncontrolled flows of contaminated water to be dispersed into the park and Lane Cove River. The Great North Walk transects the adjoining park to the south of the site, and NPWS is concerned that flows associated with the proposal will erode the pathway, increasing the risk for visitors to the park and the maintenance liability for existing infrastructure.</p> <p>It is unclear whether the proposed level spreaders and energy dissipation treatments are sufficient to reduce the volume of flows and sediment transportation from the site to levels where there will be no impacts to the neighbouring park.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> Assess and quantify any residual stormwater impacts to the adjoining Lane Cove National Park. Consider applying best-practice WSUD solutions to avoid impacts to the sensitive downstream environment. 		
<p>6. Operational water and contamination</p> <p>NPWS understands that the proposal will provide a water-cooled chiller system for the data halls. Section 3.3.10.2 confirms that water will be required for cooling tower operation, and Section 6.1.21.2 mentions that the proposal will be supplied via Sydney Water's 200mm potable networks.</p> <p>The EIS however fails to mention if there is any discharge of water required for operation of the proposal. Given the proximity to Lane Cove River, NPWS is concerned that the proposal may require discharge into the river impacting the downstream Lane Cove National Park.</p> <p>NPWS understands that two (2) basement water tanks will be used for fire (1 fire water detention tank and 1 fire water containment tank). According to the Water Management Plan, prepared by Taylor Thomson Whitting dated 11 July 2025, the fire detention tank will have an overflow pipe discharging to the OSD system. Therefore, any external fire water and debris in the event of fire will drain to the OSD and potentially discharge contaminated material towards Lane Cove National Park and Lane Cove River.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> Confirm whether any water discharge will be required for the cooling system. Assess the potential contamination impacts to Lane Cove National Park and Lane Cove River in the event of fire as a result of the proposed fire detention tank connection to the OSD. Identification of suitable mitigation measures to avoid impacts to NPWS estate. 	<p>An amended Civil Engineering Report has been prepared responding to items specified alongside.</p>	<p>Civil Engineering Report (Appendix DD21)</p>
<p>8. Erosion and sediment control</p> <p>NPWS has reviewed the Erosion and Sediment Control Plan, prepared by prepared by Taylor Thomson Whitting dated 10 July 2025.</p> <p>NPWS raises concerns with the suitability of the sediment fence in managing potential erosion and sediment impacts to the adjoining Lane Cove National Park. It is highlighted that the proposed removal of 509 trees on the site will significantly disturb the ground condition and potentially promote excess sediment transportation towards the rear boundary during construction and during rain events. The proposed earth basin is also located within an existing slope, which in the event of failure, will impact park.</p> <p>Recommendations:</p> <p>As part of the RTS, it is recommended the proponent:</p> <ul style="list-style-type: none"> Consider implementing additional erosion and sediment controls to mitigate potential impacts to Lane Cove National Park. 	<p>A revised erosion and sediment control plan has been prepared to align with the reduced extent of vegetation clearing.</p>	<p>Civil Engineering Report (Appendix DD21)</p>
Heritage NSW		
<p>Heritage Impact Assessment</p> <p>The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further the site does not contain any known historical relics. The heritage assessment sufficiently addresses the Environmental Heritage Secretary's Environmental Assessment Requirements (SEARs) issued for the project. Heritage NSW have no further comment on the EIS</p>	<p>Noted</p>	<p>N/A</p>
Aboriginal Heritage NSW		
<p>In preparing this advice Heritage NSW has reviewed the following documents:</p> <ul style="list-style-type: none"> Relevant sections of Environmental Impact Statement Julius Avenue Data Centre - prepared by Willowtree Planning, dated June 2025 Appendix 2: Architectural Plans Julius Data Centre - prepared by Greenbox Architecture Pty Ltd, dated June 2025 Appendix 19: Geotechnical Report Julius Avenue Data Centre - prepared by Douglas Partners, dated 19 June 2025 	<p>Proposed design modifications including removal of impacts associated with the STSS and access/link road, which formed the focus of HNSW agency advice, have</p>	<p>Aboriginal Cultural Heritage Assessment Report (Appendix DD26)</p>



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Key Issues	Response	Supporting Appendix / Section
<ul style="list-style-type: none"> Appendix 26: Aboriginal Cultural Heritage Assessment Report Julius Data Centre - prepared by GML Heritage, dated 19 May 2025 <p>Following review of the above documents, Heritage NSW requests additional information to inform its advice on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the Secretary's Environmental Assessment Requirements (SEARs) for the project. The Department of Planning, Housing and Infrastructure (DPHI) requests the proponents provide Heritage NSW with the following information:</p> <ol style="list-style-type: none"> The survey coverage indicated in Figure 4.1 does not sufficiently sample the area of proposed works in Survey Unit 2 (SU2). Heritage NSW note that as indicated in Section 4.1, SU2 has the potential to contain sandstone outcrops and overhangs which may contain Aboriginal objects/art/engravings. In consideration of this; <ol style="list-style-type: none"> Additional survey is required in SU2 where works are proposed, specifically the access road connection to Richardson Place and the location of the Ausgrid DTTS and Indoor MBS Room. Please update the ACHAR with additional survey tracks and discussion of the results of the additional survey. 	<p>reduced the extent of development, and thus 'impacts' within the southern portion of the site.</p> <p>A supplementary archaeological survey within the southern portion of the site was undertaken as a precautionary measure in December 2025 by GML and representatives of the RAPs. The survey confirmed that no Aboriginal sites, objects, or places were present in the area inspected, and no overhangs suitable for use as rock shelters were identified.</p> <p>No rock art, engraved or pigment, was observed during either survey. Following the additional archaeological survey, the archaeological potential of the southern portion of the study area continues to be considered low.</p> <p>It is unlikely that art sites are present within the study area. The management recommendations outlined in the ACHAR remain valid and are not altered by the findings of the recent archaeological survey. The results of the additional survey are presented in letter format forming an appendix to the amended Aboriginal Cultural Heritage Assessment Report (ACHAR).</p>	
Environmental Protection Authority (EPA)		
<p>The EPA provides information and assessment requirements below relating to data centres for consideration by DPHI as part of its assessment of the Data Centre proposal.</p> <p>a. Licencing requirements</p> <p>Proposals should clearly identify whether an Environment Protection Licence (EPL) will be required under the Protection of the Environment Operations (POEO) Act 1997. Information should be provided addressing the following thresholds in Schedule 1 of the POEO Act.</p> <ul style="list-style-type: none"> Clause 9 - Chemical Storage (diesel storage) - 2,000t, Clause 9 - Chemical Storage (pressurised gases) - 20t, Clause 17 - Energy Generation (back-up generators) - 30MW and 200hrs/pa, Any other activity in Schedule 1 that may be undertaken at the premises. <p>b. Details of generator testing</p> <p>Proposals should clearly outline the proposed testing regime for back-up generators, and provide detailed information regarding:</p> <ul style="list-style-type: none"> All testing types and details (e.g. monthly, annual) of the maintenance schedule and unscheduled works that would require use of back-up diesel generators (e.g. electrical infrastructure works), Number of tests for each generator per year, Number of generators to be tested at any one time, Testing duration for each generator (including start up and cool down), Load during testing, Time of the day testing will occur, 	<p>Proposed development does not store in excess of 2,000 tonnes on petroleum products or general chemicals. Resultantly, an Environmental Protection License is not required.</p> <p>Backup generator testing and details are within the amended AQIA and NVIA.</p>	<p>Air Quality Impact Assessment (Appendix DD17) Noise & Vibration Impact Assessment (Appendix DD18) Hazard & Risk Report (Appendix DD23)</p>



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<ul style="list-style-type: none"> Maximum number of tests per day, Total number of cumulative hours generators will be tested and operated per annum <p>c. Assessment of air quality and noise impacts</p> <p>Proposals should prepare a Noise and Vibration Impact Assessment (NVIA) and Air Quality Impact Assessment (AQIA). These assessments should be prepared in accordance with:</p> <ul style="list-style-type: none"> Approved Methods for Modelling and Assessment of Air Pollutants in NSW 2022 Noise Policy for Industry 2017 (including testing, maintenance and emergency operation of generators) Interim Construction Noise Guideline <p>Protection of the Environment Operations (Clean Air) Regulation 2022</p> <p>Where a data centre, or future changes to a data centre, exceed the threshold for Energy Generation (back-up generators - 200hr/pa) in the POEO Act and require an EPL, the Proposal will need to comply with emission concentration limits listed in Schedule 2 and Schedule 3 of the Clean Air Regulation (including NOx). Modelling Assessment reports should include modelling scenarios and inputs that represent reasonable worst-case scenario and address:</p> <ul style="list-style-type: none"> Typical operations, Operational scenarios that include generator testing, Emergency scenario (loss of power and 100% operation of back-up generators), including details on likelihood of occurrence, Consideration of cumulative impacts, including quantitative assessment where there are potential testing conflicts with any nearby data centres or industries. <p>Mitigation</p> <p>Assessment reports should include an appropriate level of information as required by the relevant guidelines on proposed mitigation and management measures, including:</p> <ul style="list-style-type: none"> Noise - A feasible and reasonable assessment of mitigation consistent with Chapter 3 of the Noise Policy for Industry (NPfI). This includes impacts from emergency scenarios which may consider the likelihood, frequency and duration of emergency events as part of the assessment. Air - Should commit to replacement of generators with best available technology. Mitigation measures to address cumulative impacts should be considered - including consideration of minimising conflict and coordinating testing times with other nearby data centres or industries and notification protocols for impacts receivers/receptors during emergency/maintenance scenarios. <p>d. Greenhouse Gas Emissions</p> <p>Proposals are to provide Greenhouse Gas (GHG) emission estimates and consider whether they will exceed 25,000t CO₂-e per annum during its operational life, which would trigger reporting under the National Greenhouse and Energy Reporting (NGERs) scheme.</p> <p>Proposals not requiring an Environmental Protection Licence will not be subject to the requirements in the NSW Large Emitters Guide (large emitters guide). However, the EPA encourages consistency with the principles of this guide to reduce scope 2 emissions as much as practicable.</p> <p>EPA encourages consideration of the following measures to reduce scope 2 emissions (see Box 8 p27 in large emitters guide).</p> <ul style="list-style-type: none"> Energy efficiency practices, Installation of on-site renewable power generation, Purchasing renewable energy certificates, Entering into green power purchase agreements. <p>Should any GHG commitments be made, DPHI should consider including those GHG commitments as part of conditions of consent for the project.</p> <p>e. Waste Management</p> <p>For data centre proposals that include forms of Battery Energy Storage Systems (BESS) the proponent should be made aware that an EPL is required to transport higher risk wastes (classification of waste batteries should be applied in accordance with EPA's waste classification guidelines) and waste tracking requirements also apply.</p> <p>Compliance with relevant dangerous goods transport legislation is required when transporting batteries considered as dangerous goods (as per the Dangerous Goods (Road and Rail Transport) Act 2008)</p>		



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Key Issues	Response	Supporting Appendix / Section
Department of Climate Change, Energy, the Environment and Water (DCCEEW Water)		
<p>1.0 Water supply, take and licensing</p> <p>1.1 Recommendation – post determination</p> <p>The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018.</p> <p>Explanation</p> <p>Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the Water Management (General) Regulation 2018 applies. An exemption may be available where the groundwater take during construction or operation is less than or equal to 3 ML per water year (cl 7, sch 4 of WM Reg). To claim this exemption certain requirements must be met, such as</p> <ul style="list-style-type: none"> the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and the records are kept for 5 years 	<p>A Water Access License (WAL) has been determined to not be required as a result of the amended development.</p>	<p>N/A</p>
Department of Climate Change, Energy, the Environment and Water (DCCEEW Water)		
<p>Site suitability</p> <p>1. Location and assessment of Ausgrid Sub-transmission Switching Station</p> <p>The State significant development application (SSDA) includes provision for a future Ausgrid precinct-wide 132 kilovolt (KV) Sub-transmission Switching Station (STSS), intended to provide power supply to the proposal. Item 22 of the Secretary's Environmental Assessment Requirements (SEARs) 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."</p> <p>While the environmental impact statement (EIS) states that the STSS will be under a separate approval pathway, the EIS includes assessment for tree removal, civil works and building pad, and access and servicing to accommodate it. CPHR advises that all proposed development stages of the STSS would be more appropriately assessed in this SSDA to address SEARs item 22.</p> <p>Given the reliance of the STSS to provide power supply for the proposal, CPHR considers the EIS does not adequately address site selection or properly consider alternative locations.</p> <p>The proposal would result in the removal of a total of 509 trees, primarily located in the STSS footprint. Section 2.8 (page 25) of the EIS states: "The Proposal causes minimal impact on the environment, with the development footprint focussed on already cleared land." It is CPHR's view the vegetation removal within the proposed STSS is inconsistent with this statement.</p> <p>The proposal would require extensive clearing of native vegetation that forms part of a key wildlife corridor along the Lane Cove River adjacent to Lane Cove National Park. The proposed location of the STSS does not address biodiversity avoidance and minimisation principles outlined in sections 6.2, 6.3A and 6.12 of the Biodiversity Conservation Act 2016 (BC Act) and Section 7 of the Biodiversity Assessment Method (BAM) 2020. CPHR advises that the location of the STSS should be reconsidered to ensure the protection of this important wildlife corridor.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> All proposed development stages of the STSS should be assessed in this SSDA to address SEARs item 22. The STSS should be relocated to a less biodiversity constrained area to ensure the protection of the wildlife corridor. <p>Extent and Timing</p> <p>Response to submissions</p>	<p>The revised location of the STSS has reduced the extent of vegetative clearing on site, reducing the number of trees to be removed (now 334, from 509).</p> <p>Refer Section 3.5 of the Amendment Report for a detailed assessment.</p>	<p>Architectural Plans (Appendix DD2) Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)</p>
<p>Macquarie Park Precinct state-led rezoning planning framework</p> <p>2. Inconsistency with Macquarie Park Design Guide</p> <p>The proposed STSS is inconsistent with Provision 1 of Section 5.2 Building Line Setbacks of the Design Guide as it is located within the 'Landscape Setback' shown in Figure 37b and provided below.</p>	<p>The revised location of the STSS has negated the issues identified alongside. Refer to the amended Architectural Plans.</p> <p>Refer Section 3.5 of the Amendment Report for a detailed assessment.</p>	<p>Architectural Plans (Appendix DD2)</p>



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<p>As previously mentioned, the proposal would require extensive clearing of native vegetation that forms part of a wildlife corridor along the Lane Cove River. The proposal is inconsistent with the following biodiversity avoidance and minimisation principles, objectives and provisions of the Design Guide:</p> <ul style="list-style-type: none"> Section 2.3 Design Principles, Principle 20 – Biodiverse & Regenerative: Prioritise natural systems, maintain a net positive impact on biodiversity, and foster local ecology to create a biophilic environment Section 6.5 Canopy Coverage and Biodiversity: <ul style="list-style-type: none"> Objective c) Maximise the future mature tree canopy and vegetation coverage across the Precinct, providing a green and healthy environment that supports active lifestyles Objective d) Ensure no net loss of tree canopy coverage within development lots Objective g) Provide habitat connectivity for mobile species between key local and regional green and blue spaces Objective h) Establish a biophilic environment that provides a material connection to natural systems Objective i) Achieve a Net Positive Impact on biodiversity in every development Provision 1: Avoid negative biodiversity impacts, particularly to native vegetation and habitat trees containing hollows, when introducing new streets and other infrastructure Provision 4: Development should retain and regenerate established vegetation and ensure new and existing vegetation is connected as families of trees and plants. <p>In this context, CPHR is of the view that the proposed STSS is inconsistent with the intent and requirements of the Design Guide.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Revise the location of the STSS to be: <ul style="list-style-type: none"> consistent with the Design Guide outside of the landscape setback shown in Figure 37b of the Design Guide. <p>Extent and Timing Response to submissions</p>		
<p>Biodiversity</p> <p>3. Draft version of Biodiversity Development Assessment Report (BDAR)</p> <p>Section 6.15 of the BC Act requires the BDAR to be certified by an accredited assessor. The BDAR provided to CPHR is a draft version and does not contain a certification and declaration by an accredited assessor.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Update and submit to CPHR a final version of the BDAR that is certified by an accredited assessor. <p><i>Extent and Timing</i> Response to submissions</p>	<p>The amended BDAR provided is certified by an accredited assessor (Joshua Drane, Accreditation: BAAS25022).</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>4. BDAR – artificial night lighting</p> <p>Artificial night lighting from the proposal may affect fauna species in the adjoining Lane Cove River wildlife corridor to the south-east.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Update the BDAR to include a list of threatened fauna species likely to be affected by artificial lighting in the adjoining Lane Cove River wildlife corridor and demonstrate how lighting impacts to these species will be avoided, minimised, or mitigated. Assess lighting impacts to threatened species in accordance with Sections 7 and 8 of BAM (2020) and the BAM Operational Manual – Stage 2 (2023), including consideration of serious and irreversible impacts (SAII) where relevant. Prepare a Light Management Plan, developed with an appropriately qualified lighting consultant. Align the plan with the <i>National Light Pollution Guidelines for Wildlife</i> (Australian Government, 2023) Update all relevant architectural design plans to demonstrate how light spill will be mitigated. <p><i>Extent and Timing</i> Response to submissions</p>	<p>Outdoor lighting has been updated to remove lighting within bushland area pathways with remaining lights along the southern border of the development footprint to contain directional cowlings to prevent light spill into bushland area in the south. Lights will be set up with sensors to reduce the amount the lighting on the site will be on.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>5. BDAR – potential for bird collision</p> <p>The BDAR does not adequately address the risk of bird collisions with the proposed building, as required by Section 5.4. Building Frontages, Provision 6 of the Design Guide.</p>	<p>The amended design incorporates UV reflective glass and facades to reduce risk of bird collisions. Low likelihood of</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>



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<p>Reducing bird collision risk is a key design consideration that must be integrated into the proposal. The proposal must demonstrate how building design, materials, and treatments have been selected to mitigate this risk.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Engage a qualified and experienced ecological or avian consultant to assess the potential for bird collisions and recommend mitigation measures. This assessment should consider, but not be limited to: <ul style="list-style-type: none"> use of patterned or UV-reflective glass, as birds can detect UV light application of green walls or façade treatments to break up large reflective surfaces architectural modifications that reduce mirror-like or see-through effects of glass. Update all architectural plans to incorporate recommendations proposed by the qualified and experienced ecological or avian consultant. Update the BDAR: <ul style="list-style-type: none"> demonstrate how the proposed building design and materials minimise bird collision risk include consideration of any threatened bird species likely to be impacted ensure threatened species predicted to be impacted are considered in line with the BAM (2020), including for SAI where applicable. <p><i>Extent and Timing</i> Response to submissions</p>	<p>any threatened birds to be impacted by collision with the development.</p>	
<p>6. BDAR - Inadequate avoidance</p> <p>The requirement to avoid or minimise impacts in accordance with sections 6.2, 6.3A and 6.12 of the BC Act and Section 7 of BAM (2020) has not been adequately addressed for the following abovementioned items:</p> <ul style="list-style-type: none"> 1 and 2 regarding the proposed STSS location 4 regarding artificial night lighting 5 regarding bird collision. <p>Recommended action:</p> <ul style="list-style-type: none"> Update the avoid and minimise section of the BDAR after addressing issues raised in Items 1, 2, 4 and 5. <p><i>Extent and Timing</i> Response to submissions</p>	<p>Proposal design updated to further reduce the development footprint by moving the STSS location to the basement of the data centre, removing the Richardson Place extension.</p> <p>Artificial night lighting will be limited in the retained bushland area and cowlings installed on southern boundary lighting to reduce light spill to retained bushland, outdoor lighting to be setup on sensors to reduce lighting period.</p> <p>Development design updated to include UV reflective glass glazing on the outdoor windows and incorporate concrete panelling in sections of the building to reduce risk of bird collisions.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>7. BDAR - South-eastern Glossy Black-Cockatoo</p> <p>The South-eastern Glossy Black-Cockatoo (<i>Calyptorhynchus lathami lathami</i>) was excluded from the list of predicted ecosystem species in Table 11 of the BDAR on the basis that the subject land does not contain Allocasuarina or Casuarina species. However, the subject land contains a high number of casuarinas including within the mapped PCT 3592 Sydney Coastal Enriched Sandstone Forest (PCT 3592) that were identified in the Arboricultural Impact Assessment (AIA).</p> <p>CPHR notes there is an inconsistency with the exclusion of this species as the BDAR also states after Table 11, "All the ecosystem credit species have been included based on the Threatened Biodiversity Data Collection (TBDC) habitat constraints", and the credit report shows that no ecosystem species were removed from the BAM calculator (BAM-C).</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Check for consistency within the BDAR and update where applicable. If South-eastern Glossy Black-Cockatoo has been excluded, provide additional justification in the BDAR. <p><i>Extent and Timing</i> Response to submissions</p>	<p>This error has been amended in the BDAR provided alongside this amendment. South-eastern Glossy Black Cockatoo was retained in the BOAMS case party and credit reports.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>8. BDAR - Large-eared Pied Bat</p> <p>The Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>) was excluded as a species credit species within the regrowth zone of PCT 3592. However, the only habitat constraint listed in the TBC is "Within two kilometres of rocky areas containing caves, overhangs, escarpments, outcrops, or crevices, or within two kilometres of old mines or tunnels." The regrowth zone of PCT 3592 is within 2km of such features.</p>	<p>Large-eared Pied Bat: species polygon and inclusion in vegetation zone 3592_regrowth have been reflected in the amended BDAR.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>



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<p>The BDAR provides insufficient justification to demonstrate why the regrowth zone of PCT 3592 does not provide suitable habitat for this species, for example, for foraging.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Update the BDAR to include PCT 3592 regrowth zone as suitable habitat for Large-eared Pied Bat or provide further justification for it being excluded. <p><i>Extent and Timing</i> Response to submissions</p>		
<p>9. BDAR - Haloragodendron lucasii</p> <p>The BDAR contains inconsistent statements regarding the inclusion/exclusion of <i>Haloragodendron lucasii</i> which is a SAll entity. Table 12 of the BDAR states that <i>Haloragodendron lucasii</i> was retained as a species credit species. On page 34, the BDAR states: "No species were excluded based on geographic limitations as mapped by the Threatened Species Profile distribution mapping", while on page 37 the BDAR states that this species [<i>Haloragodendron lucasii</i>] "was excluded due to geographic limitation "East of the Pacific Highway and South of Broken Bay" as the subject land is west of the Pacific Highway".</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Check for consistency within the BDAR and update throughout where applicable. <i>Haloragodendron lucasii</i> (SAll) requires further assessment/justification if the species is being excluded. If the geographic limitation is relied on, the updated BDAR is to provide a reference for this geographic limitation. <p><i>Extent and Timing</i> Response to submissions</p>	<p>BDAR amended in all sections to remove due to geographic limitation as it is west of the Pacific Highway as stated in the TBDC and BOAMS.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>10. BDAR - species credit species</p> <p>The BDAR eliminates several SAll flora species from PCT 3952 based on degraded habitat without conducting targeted surveys. In Table 12 of the BDAR, all predicted flora species credit species were "eliminated in vegetation zone 3952_Regrowth on the basis of 'habitat degraded', available habitat has been highly modified with disturbed soil levels, and excavation of bedrock" (pages 34-35). CPHR disagrees that this degraded habitat could not reasonably provide habitat for these threatened species, given appropriate surveys were not conducted. In addition, no targeted surveys were conducted for the following SAll entities generated in the BAM-C:</p> <ul style="list-style-type: none"> <i>Deyeuxia appressa</i> <i>Hibbertia spanantha</i> <i>Rhizanthella slateri</i>. <p>Recommended actions:</p> <ul style="list-style-type: none"> Conduct flora surveys or provide expert reports for: <i>Deyeuxia appressa</i> (SAll) <i>Hibbertia spanantha</i> (SAll) <i>Rhizanthella slateri</i> (SAll) <i>Darwinia biflora</i> (previously recorded on site) Alternatively, assume presence within the regrowth PCT 3952 zone. <p><i>Extent and Timing</i> Response to submissions</p>	<p>Further information provided in updated BDAR on habitat degraded argument. The 3592_Regrowth area has been highly modified with the removal of soil and excavation of sandstone bedrock. The regrowth vegetation is growing in very shallow sandy soil recently eroded since excavation. In addition, all threatened species transects covered the vegetation zone 3592_regrowth area.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>11. BDAR - Biodiversity Offsets and Agreement Management System (BOAMS) access</p> <p>CPHR is unable to complete a full review of this SSDA due to not having access to the BDAR case and digital files via the BOAMS.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> The ecological consultant adds 'Greater Sydney - Compliance & Regulation' as a Case Party in BOAMS, uploads the required digital files (refer to Appendix L - Table 27 in BAM (2020) for what is required), and submit the case to 'Greater Sydney - Compliance & Regulation' as the consent authority. <p><i>Extent and Timing</i> Response to submissions</p>	<p>CPHR added to case party with required digital files.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>12. BDAR - Table 17</p> <p>Table 17, under the column titled "Habitat constraints / microhabitats present on the subject land / vegetation zone", appears to refer to incorrect PCT zones for some entities.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Review Table 17 to ensure the correct PCT zone is referred to and update where applicable. 	<p>The BDAR has been amended to reflect correct PCTs.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p><i>Extent and Timing</i> Response to submissions</p> <p>13. BDAR - Appendix D</p> <p>Appendix D Vegetation survey data is incomplete.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Provide the plot field data in Microsoft Excel format via BOAMS – refer to Table 27 in BAM 2020. <p><i>Extent and Timing</i> Response to submissions</p>	<p>Vegetation data provided in Appendix D of the amended BDAR.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>14. BDAR mitigation measures - Vegetation Management Plan</p> <p>The BDAR recommends the preparation of a vegetation management plan (VMP). CPHR requests this VMP be submitted with the SSDA.</p> <p>Section 6.5 Canopy Coverage and Biodiversity, Provisions 2, 4 and 7 of the Design Guide also requires enhancing habitat that includes implementing artificial hollows.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Submit the VMP with the SSDA prior to determination, to allow for review and if approved, for integration into consent conditions. The VMP must encompass the area to the south of the proposed internal access road, which corresponds to the 'landscape setback' area shown in Figure 37b of the Design Guide. The VMP should include, but not be limited to: <ul style="list-style-type: none"> a description of the site management objectives specific management actions, including site preparation, site management, weed management, regeneration/revegetation, habitat supplementation, and maintenance outline monitoring and reporting requirements, including clearly defined performance criteria to assess progress and success a budget reflecting all actions, materials, labour, maintenance, and contingency costs a schedule for task implementation list of suitable plantings maps showing management zones and areas of proposed works. The VMP must remove non-native vegetation located within the VMP area and include revegetated/regenerated vegetation with locally native species. Details on how this will be achieved to be provided in VMP including performance targets, monitoring and reporting requirements. The VMP must include a section that specifies that a subset of tree trunks and root balls are salvaged from the proposed tree clearing and placed within the VMP area for fauna habitat. In addition, any hollow logs or tree hollows are to be salvaged from cleared trees. The VMP is to include the requirement to carve 10 tree hollows into live trees within the VMP area using a carving tool, such as the 'hollow-hog'. Hollow host trees are to be located away from pedestrian and vehicle access and buildings. Target species should include a range of vertebrate hollow-using species, such as microbats, birds and arboreal mammals. The carving of hollows must be undertaken by a suitably experienced arborist. Carving of hollows is preferred over the use of nest boxes. The VMP is to be prepared by a suitably qualified ecologist with a minimum Certificate III in Conservation and Land Management, with experienced in writing VMPs. Update the Landscape Plan to ensure consistency with the VMP. <p><i>Extent and Timing</i> Response to submissions</p>	<p>Further details are provided in amended BDAR. Vegetation Management Plan to be produced as part of consent conditions.</p>	<p>Biodiversity Development Assessment Report (Appendix DD15)</p>
<p>15. Bushfire Assessment Report - Asset Protection Zone</p> <p>The proposed extent of the asset protection zone (APZ) in the Bushfire Assessment Report is inconsistent. Page 23 states, "At the commencement of construction works and in perpetuity all areas within the subject property to the northern, eastern and western boundaries and for a minimum distance of 20 metres to the south of the Data Centre shall be maintained as an Asset Protection Zone (Inner Protection Area)". While the executive summary and the APZ overlay on page 28 shows a reduced APZ to the south, extending from the data centre to the internal access road only that is the STSS has no APZ on its southern side.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Update the Bushfire Assessment Report so it is consistent and reflects the proposed APZ. Ensure that impacts to vegetation from creation and management of the proposed APZ are assessed in the BDAR. <p><i>Extent and Timing</i> Response to submissions</p>	<p>An amended Bushfire Assessment with revised APZ locations has been prepared.</p>	<p>Bushfire Assessment (Appendix DD30)</p>
<p>16. Landscape Plan - public recreation infrastructure</p>	<p>The amended Landscape Drawings and Report have removed one of the</p>	<p>Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>The proposal includes walkways and viewing platforms within the vegetated setback of the subject land. The adjoining land to the south already contains a walking track that is part of the Great North Walk. The proposed recreation infrastructure appears, in part, to be provided in accordance with a building height increase under section 7.7 of the Ryde Local Environmental Plan 2014.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Locate the proposed recreational infrastructure closer to the proposed buildings and reduce in scale to minimise impacts on the wildlife corridor. <p><i>Extent and Timing</i> Response to submissions</p>	<p>pedestrian links to minimise impacts on wildlife corridors.</p>	
<p>17. AIA - limited assessment of design plans</p> <p>The AIA has only assessed a limited subset of the available design plans.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Provide an updated AIA that assesses in full all proposed impacts to all trees within the subject site. This assessment to include, but not be limited to, a comprehensive review of: <ul style="list-style-type: none"> stormwater and sewer service plans bulk earthworks plans any other relevant civil or landscape plans that may affect existing vegetation. <p><i>Extent and Timing</i> Response to submissions</p>	<p>An amended Arboricultural Impact Assessment (AIA) has been prepared as an appendix to the Landscape Report.</p>	<p>Landscape Report (Appendix DD12)</p>
<p>18. AIA - no detailed tree and site specific requirements</p> <p>The main body of the AIA provides general recommendations rather than prescriptive specifications. Further, the specifications included in Appendix 6 are generic and insufficiently detailed to ensure trees will be adequately protected during construction and retained in a viable condition.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Update the AIA to include detailed, site- and tree-specific tree protection specifications (TPS) in accordance with AS 4970-2025 – Protection of Trees on Development Sites. These specifications must: <ul style="list-style-type: none"> clearly outline the tree protection measures, and tree-sensitive construction methods required to viably retain each tree, and be provided as prescriptive specifications, not as general or optional recommendations. Reflect all specified tree protection measures in the updated plans. For example: <ul style="list-style-type: none"> if new pavements within tree protection zones (TPZs) are to be constructed above existing grade, including all sub-base layers, this must be clearly illustrated on relevant plans if underground boring is specified for service installation within TPZs: – longitudinal sections must be provided to demonstrate the minimum top of the pipe (obvert) depth is achieved – starting and receiving pit locations must be clearly marked on plans. <p><i>Extent and Timing</i> Response to submissions</p>	<p>The amended AIA maintains consistency with AS4970-200 as the applicable development at the time of lodgement, as well as providing consideration to the items specified alongside.</p>	<p>Landscape Report (Appendix DD12)</p>
<p>19. AIA - no Tree Protection Plan</p> <p>The AIA does not include a tree protection plan (TPP), instead deferring its preparation to a later stage.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> Submit the TPP as part of the SSDA, to allow for proper review and to ensure coordination with all relevant plans for example civil, landscape, architectural. The TPP must: <ul style="list-style-type: none"> be prepared in accordance with AS 4970:2025 – Protection of Trees on Development Sites clearly illustrate the TPS for each tree, including TPZ and structural root zone (SRZ) boundaries, tree protection fencing, construction exclusion zones, and any tree-sensitive construction methods be coordinated with site layout, services, and staging to confirm viable tree retention during all phases of the proposed development. <p><i>Extent and Timing</i> Response to submissions</p>	<p>The amended AIA has included a Tree Protection Plan as requested.</p>	<p>Landscape Report (Appendix DD12)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>20. Stormwater outlets and use of level spreaders</p> <p>The provided stormwater plan (241920 TTW 00 DR CI 04101 D) shows gravel filled energy dissipation trenches and level spreaders to discharge stormwater into the downslope ecologically sensitive vegetated area. The proposed level spreader/trenches do not appear to follow the contours which would make them ineffective.</p> <p>This stormwater plan appears to show a headwall outlet without any erosion protection measures proposed along the eastern boundary (see image below).</p> <p>CPHR is concerned about the ongoing effectiveness of the proposed on-site stormwater solution. There is a risk that sediment and other debris may obstruct the spreaders/trenches, potentially comprising their function. Without ongoing maintenance, this could lead to increased erosion potential downslope over time.</p> <p>The discharge of significant stormwater flows via level spreaders is likely to cause significant erosion at the proposed outlet locations and uncontrolled runoff over vegetation, including access pathways leading to Lane Cove National Park. This may also lead to diversion of flows onto other properties including the City of Ryde Council offices. To mitigate these risks, detailed design and justification for the use of level spreaders must be provided. CPHR advises that the proposed method of stormwater release will require consultation and approval from the neighbouring land holder, NPWS and also from the City of Ryde.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> • All outlets must prevent erosion and optimise dispersion so they do not contribute to soil erosion downslope. Additional measures be considered to maximise the dispersion. Consideration may be given to a combination of an abortion trench, level spreader and/or rainwater garden. • Obtain approval with NPWS and City of Ryde on the proposed stormwater management approach. • If accepted by the relevant authority, level spreaders/trenches must be designed to follow contours. • Engage a suitably qualified stormwater engineer to: <ul style="list-style-type: none"> ○ assess feasibility and suitability ○ justify erosion protection effectiveness ○ confirm compliance with City of Ryde Council's requirements ○ confirm legal discharge point. • Provide a maintenance schedule for these stormwater structures with implementation enforced via an agreement with the relevant public authority. • Update the BDAR to demonstrate how the proposed on-site stormwater discharge solution effectively protects the downslope environment long-term from, for example, erosion and contamination. <p><i>Extent and Timing</i> Response to submissions</p>	<p>An amended Civil Engineering Report has been prepared comprising amended erosion protection measures.</p>	<p>Civil Engineering Report (Appendix DD21)</p>
<p>21. Soil and water management during construction and operation</p> <p>The subject land slopes downward toward a sensitive receiving water environment, Lane Cove River via Lane Cove National Park. The management of stormwater quality, erosion and sediment control and fire water are key concerns for this SSDA.</p> <p>Extensive quantities of spoil are proposed to be removed from the subject land which will require implementation of additional erosion and sediment controls and preparation of more detailed soil and water management plans.</p> <p>The Water Management Plan states the fire detention tank will have an overflow pipe discharging to the on-site detention (OSD) system as backup storage. CPHR advises this proposed strategy would be prone to failure as any external fire water and debris in the event of fire would drain to the OSD and potentially discharge contaminated material towards Lane Cove National Park and Lane Cove River.</p> <p>Stormwater treatment is currently limited to the use of Ocean Protect cartridges. While these devices can effectively remove pollutants when properly maintained, they are not considered to be a complete Water Sensitive Urban Design (WSUD) solution.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> • Implement additional erosion and sediment controls and provide more detailed soil and water management plans. • Assess potential contamination impacts to Lane Cove National Park and Lane Cove River in the event of fire resulting from the fire detention tank connection to the OSD and provide mitigation measures. • The design is not limited to Ocean Protect cartridges but also includes integration of other WSUD solutions. <p><i>Extent and Timing</i> Response to submissions</p>	<p>An amended Civil Engineering Report has been prepared comprising amended erosion and sediment control measures.</p>	<p>Civil Engineering Report (Appendix DD21)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>22. Inadequate Flood Impact and Risk Assessment</p> <p>CPHR could not provide a complete assessment of flood risk due to the considerable number of inconsistencies within the Flood Impact and Risk Assessment (FIRA). These inconsistencies include but are not limited to the following:</p> <p>Flood modelling</p> <p>The flood modelling does not cover the entire subject land and currently stops at the vegetation line.</p> <p>The flood modelling also doesn't include the STSS building that is below the access road as shown on civil and architectural design plans.</p> <p>The FIRA also indicates that the site survey was used to inform both the pre-development and post development models however the model is clipped at the tree line. The flood modelling for the FIRA must include the entire subject land including the STSS and extend through to the Lane Cove River.</p> <p>Pre-development condition</p> <p>The subject land's current topography which was altered by the previous bulk excavation and retaining wall construction does not reflect its original pre-development condition. These features are currently in the flood mapping which does not represent the flood behaviour of the subject land prior to the initial earthworks. The pre-development topography before the previous bulk earthworks should be included in the flood model to reflect the subject land's original landform.</p> <p>Flood planning levels</p> <p>The FIRA indicates that the probable maximum flood (PMF) level and the 1% Annual Exceedance Probability (AEP) flood level are identical. This outcome is not considered realistic as multiple flood planning levels would apply due to the steep topography and flow paths down each side of the subject land. Flood planning levels need to be provided as sections throughout the subject land to demonstrate how the proposal conforms to the flood planning requirements. Further detail is required for the proposed bund wall/cul-de-sac and access road areas. The FIRA indicates there is deeper water in the area upstream of the access road, however the information provided does not clearly explain how stormwater/pavements and overland flow paths would operate in this area. It is also unclear how potential impacts on the cul-de-sac and the City of Ryde Council site will be managed.</p> <p>Pipe upgrades</p> <p>The FIRA proposes pipe upgrades to mitigate flood impacts, however the design drawings show large diameter pipes are connected downstream to smaller diameter pipes near the proposed building. While the FIRA states that blockage has been considered, no supporting details or modelling assumptions were provided. Further justification with details and modelling assumptions is required.</p> <p>To verify the adequacy of the proposed drainage system, hydraulic grade lines and long sections are required for all diversion pipework. These should demonstrate that surcharge flow does not occur and confirm that pipework can pass under other services.</p> <p>Storage of materials</p> <p>City of Ryde Council requires that all storage of materials, including fuel should be located above the flood planning level. The proposal includes fuel storage within the basement, but there is no information provided to confirm whether the basement would be located above the flood planning level. Further information is required to demonstrate fuel storage would be located above the flood planning level.</p> <p>Velocity and hazards</p> <p>The FIRA presents low flood velocities and hazard categories in many locations of the subject land which appears inconsistent given the steep topography. For example, Figure 42 of the FIRA indicates a velocity of just 0.5 m/s at the energy dissipation zone above the pedestrian access path. The velocity and hazard modelling should be reviewed and flood mapping updated accordingly.</p> <p>Mapping</p> <p>Multiple flood model outputs use a red colour for depth however, this is not defined in the map legend. Clarification is required to understand how it is defined in the flood mapping.</p> <p>Also, some flood maps for example Figures 34 and 38 are labelled as hazard maps but appear to show flood depth and not hazard. This inconsistency should be addressed to ensure the maps are accurately labelled and interpreted.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> The flood modelling for the FIRA includes the entire subject land including the STSS and extends through to the Lane Cove River. 	<p>An amended Flood Impact Risk Assessment has been prepared encapsulating items specified alongside.</p>	<p>Flood Impact Risk Assessment (Appendix DD22)</p>



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<ul style="list-style-type: none"> The pre-development topography before the previous bulk earthworks should be included in the flood model to reflect the subject land's original landform. Flood planning levels need to be provided as sections throughout the subject land to demonstrate how the proposal conforms to the flood planning requirements. Further detail is required in the proposed bund wall/cul-de-sac and access road areas. The proposed pipe upgrades require further details and modelling assumptions with justification. Hydraulic grade lines and long sections are required for all diversion pipework. Further information is required to demonstrate that fuel storage would be located above the flood planning level. The applicant's flood consultant checks the velocity and hazard modelling. Update the flood mapping. <p><i>Extent and Timing</i> Response to submissions</p>		
AUSGRID #1		
<p>Ausgrid Overhead Powerlines are in the vicinity of the development.</p> <p>The developer should refer to SafeWork NSW Document – Work Near Overhead Powerlines: Code of Practice. This document outlines the minimum separation requirements between electrical mains (overhead wires) and structures within the development site throughout the construction process. It is a statutory requirement that these distances be maintained throughout the construction phase.</p> <p>Consideration should be given to the positioning and operating of cranes, scaffolding, and sufficient clearances from all types of vehicles that are expected be entering and leaving the site.</p> <p>The "as constructed" minimum clearances to the mains must also be maintained. These distances are outlined in the Ausgrid Network Standard, NS220 Overhead Design Manual. This document can be sourced from Ausgrid's website at www.ausgrid.com.au. It is the responsibility of the developer to verify and maintain minimum clearances onsite. In the event where minimum safe clearances are not able to be met due to the design of the development, the Ausgrid mains may need to be relocated in this instance. Any Ausgrid asset relocation works will be at the developer's cost.</p>	Noted. To be conditioned	N/A
<p>Ausgrid Underground Cables are in the vicinity of the development.</p> <p>Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways.</p> <p>It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA).</p> <p>In addition to BYDA the proponent should refer to the following documents to support safety in design and construction:</p> <p>SafeWork Australia – Excavation Code of Practice.</p> <p>Ausgrid's Network Standard NS156 which outlines the minimum requirements for working around Ausgrid's underground cables. The following points should also be taken into consideration.</p> <p>Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed.</p> <p>Should ground levels change above Ausgrid's underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing.</p> <p>Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable.</p>	Noted. To be conditioned	N/A
<p>New Driveways - Proximity to Existing Poles</p> <p>Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.</p>	Noted. To be conditioned	N/A



TABLE 15: RESPONSE TO AGENCY SUBMISSIONS

Key Issues	Response	Supporting Appendix / Section
<p>New or modified connection</p> <p>To apply to connect or modify a connection for residential or commercial premises. Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Visit the Ausgrid website for further details; https://www.ausgrid.com.au/Connections/Get-connected</p> <p>Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances "Working Near Ausgrid Assets - Clearances". This document can be found by visiting the following Ausgrid website: http://www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries</p>	<p>Noted. To be conditioned</p>	<p>N/A</p>
<p>AUSGRID #2</p>		
<p>Refer to the additional advice below regarding Easements</p> <p>There is an Ausgrid Easement positioned adjacent to the property.</p> <p>This easement was acquired for the 132,000-volt transmission assets currently owned and operated by Ausgrid. The purpose of the easement is to protect the transmission assets and to provide adequate working space along the route of the lines for construction and maintenance work. The easement also assists Ausgrid in controlling works or other activities under or near the transmission lines which could either by accident or otherwise create an unsafe situation for workers or the public or reduce the security and reliability of Ausgrid's network.</p> <p>Existing Ausgrid easements, leases and/or right of ways must be maintained at all times to ensure 24-hour access. No temporary or permanent alterations to this property tenure can occur without written approval from Ausgrid.</p> <p>For further details refer to Ausgrid's Network Standard 143.</p> <p>Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances "Working Near Ausgrid Assets - Clearances".</p> <p>This document can be found by visiting the following Ausgrid website http://www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries</p>	<p>Noted.</p>	<p>N/A</p>



TABLE 16: RESPONSE TO COMMUNITY SUBMISSIONS

Key Issue	No. of Submissions	Main Concerns Raised	Response	Supporting Appendix / Section
Tree Removal & Vegetation Loss	141	<ul style="list-style-type: none"> 509 mature trees removal - universally cited figure, many over 100 years old 1.33-1.78ha Sydney Coastal Enriched Sandstone Forest (critically endangered) Only 143 replacement trees vs Council requirement of 1,527 (3:1 ratio) Tree hollows take 100+ years to develop - irreplaceable for wildlife Century-old soil profiles and ecosystem cannot be recreated 7 threatened species habitats: 3 bat species, 4 plant species 	The extent of vegetation clearing has been significantly reduced as a result of the amended development. This is attributed to the reduction in building bulk and scale, relocation of STSS and removal of the Richardson Place extension.	Architectural Plans (Appendix DD2) Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12)
Ausgrid Substation (STSS)	28	<ul style="list-style-type: none"> 60m x 30m footprint not included in main application Located in bushland at highest fire risk area Requires 5m cleared perimeter for access Power supply route through park unclear Poor placement could be integrated into main footprint Additional vegetation clearing for HV supply not assessed 	The STSS has been relocated adjacent to the building to better integrate with the built form of the site. The amended Bushfire Assessment has also factored in APZs.	Architectural Plans (Appendix DD2) Bushfire Assessment (Appendix DD30)
Bushfire Management	78	<ul style="list-style-type: none"> Site experienced two major bushfires in last 25 years Category 1 vegetation - highest bushfire risk Cannot meet minimum APZ requirements (90m building, 55m generators) Evacuation routes blocked: Epping Rd, Mowbray Rd, Delhi Rd Climate change increasing fire frequency/intensity ignored Catastrophic cascade potential: bushfire → explosion → contamination 	Refer above.	Bushfire Assessment (Appendix DD30)
Flooding & Stormwater	42	<ul style="list-style-type: none"> Site 100% inundated by probable maximum flood Stormwater discharge designed to flow into National Park Slope topography - all pollution flows toward park and river Sediment and erosion risks during construction Contamination from dust, chemicals, minerals Historical sedimentation problems from previous clearing 	An amended Flood Risk Impact Assessment has been prepared by TTW to ensure that flows into Lane Cove National Park are mitigated through detailed assessment and design.	Flood Risk Impact Assessment (Appendix DD22)
Generator Testing & Air Quality	58	<ul style="list-style-type: none"> 72-73 backup generators requiring regular testing 1,971 hours annual testing (82 days equivalent) NO₂/PM2.5 exceedances expected during outages Western Sydney data centre precedent already exceeds air quality criteria 100% fossil fuel powered - no renewable energy commitment CO₂ emissions: 5,168-7,008t per MW annually (academic citations provided) 	The reduction in the operational capacity of the data centre has greatly reduced	Backup Power Summary (Appendix DD16)
Traffic & Access	35	<ul style="list-style-type: none"> 115 parking spaces increasing wildlife strikes Lady Game Drive/Delhi Rd junction severe bottleneck (Fullers Bridge) Morning peak traffic backs up over 1km Richardson Place access unsafe for vehicles Area poorly served by public transport Construction traffic impacts for 4.5 years 	An amended Transport Impact & Accessibility Impact Report and Construction Traffic Management Plan have assessed the traffic impacts through detailed SIDRA modelling.	Transport Impact & Accessibility Impact Report (Appendix DD8) Construction Traffic Management Plan (Appendix DD9)
Water & Wastewater	61	<ul style="list-style-type: none"> 6.2-8 million litres/day consumption (30,000 households equivalent) Using potable water for cooling - "waste of valuable resource" No drought scenario modelling provided Heated water discharge affecting Lane Cove River ecosystems Competition with residential developments for water supply US precedent residents report "can't drink the water" 	Water demand has reduced by approximately 2,250 million litres per year, from 2,258 million litres per year to 7.2 million litres per year (99.7% reduction through the revised development.	Infrastructure Delivery, Management & Staging Plan (Appendix DD29)
Fire Safety & Storage	82	<ul style="list-style-type: none"> 1,272,000 litres diesel storage (840,000L in some submissions) 35,280kg lithium-ion batteries - thermal runaway risk 12 x 70,000L diesel tanks on bushfire-prone land Near childcare centre and residential areas Exceeds SafeWork NSW manifest quantities Potential contamination pathway to Sydney Harbour 	The development has been ascertained as not being classed as a 'potentially hazardous industry' pursuant to <i>Applying SEPP 33</i> guidelines.	Hazard & Risk Report (Appendix DD23)



TABLE 16: RESPONSE TO COMMUNITY SUBMISSIONS

Key Issue	No. of Submissions	Main Concerns Raised	Response	Supporting Appendix / Section
Urban Design & Visual Impact	48	<ul style="list-style-type: none"> 50.93m height exceeds 30m base, 45m incentive limits Seven-storey data hall, five-storey office visible from 23 viewpoints Gateway location - entry to Macquarie Park from M2 "Industrial wall" replacing bushland edge Great North Walk experience devastated 51m building "unacceptable eyesore" interrupting valley views 	The development has reduced the height to 40m, permissible pursuant to Clause 7.7 of RLEP2014. The extent of built form has been greatly reduced.	Architectural Plans (Appendix DD2)
Aboriginal Heritage & Surveys	8	<ul style="list-style-type: none"> Two Aboriginal sites (AHIMS #45-6-1854, #45-6-1855) within 20m Dharug Country - 65,000+ years of Indigenous connection Multiple sites across river will have views destroyed 24/7 lit industrial complex impacts cultural landscape Inadequate consultation with Traditional Owners Cultural significance of Lane Cove River ignored 	<p>GML Heritage undertook an additional heritage survey to confirm the Aboriginal archaeological potential of the development area.</p> <p>The additional survey confirmed prior survey interpretations that no Aboriginal objects, engraved art or pigmented art. Sandstone overhangs identified during the survey were considered unsuited for human occupation and did not contain Aboriginal objects or an Aboriginal archaeological deposit.</p>	Aboriginal Cultural Heritage Assessment Report (Appendix 26)
Wildlife Corridor Impact	128	<ul style="list-style-type: none"> Critical corridor width would be halved along Lane Cove River 1994 bushfire refuge that saved swamp wallaby population Direct observations: wallabies, echidnas, Powerful Owls, bandicoots Connectivity between Lane Cove NP sections to Field of Mars Part of Sydney Harbour to Blue Mountains corridor system Wildlife movement, breeding, genetic diversity compromised 	An amended BDAR has reflected the revised scope of development, greatly reducing the extent of clearing proposed, ensuring habitats are not impeded.	Biodiversity Development Assessment Report (Appendix DD15)
24/7 Operational Impacts	71	<ul style="list-style-type: none"> Continuous noise "drone" already audible from existing centres Light pollution killing 60 billion insects/summer, disrupting plant flowering Heat plumes and steam clouds observed from current data centres Valley amphitheatre effect amplifies noise to residents Pollination drops 63%, fruit production -13% from light impacts Benefits invasive predators (foxes, cats) over native species 	The reduction in facility capacity proposed through this amendment has significantly reduced the operational impacts of the site, refer to the amended NVIA prepared.	Noise & Vibration Impact Assessment (Appendix DD18) Infrastructure Delivery, Management & Staging Plan (Appendix DD29)
Energy & Infrastructure	68	<ul style="list-style-type: none"> 169-170MW demand - 2% of Sydney's peak, equivalent to 50,000+ homes Area already has 9+ data centres (400MW+) with 5 more proposed Cumulative impact never assessed - uncoordinated development Grid security concerns during emergencies Ausgrid capacity unavailable - must be negotiated Only -50 ongoing jobs for massive infrastructure demand 	The Infrastructure Delivery, Management & Staging Plan has ascertained that the infrastructure accompanying the development is able to service the proposed data centre.	Infrastructure Delivery, Management & Staging Plan (Appendix DD29)
Alternative Sites Available	62	<ul style="list-style-type: none"> Industrial zones: Eastern Creek, Silverwater, Alexandria, Erskine Park Regional Renewable Energy Zones: Dubbo, Tamworth, Wagga Wagga Macquarie Industrial Park repeatedly suggested Vacant buildings and brownfield sites throughout Sydney International precedent: Melbourne, Amsterdam, Dublin banning metro centres \$1.5 billion project could easily relocate 	The development remains permissible with consent pursuant to RLEP2014 and is located in an area containing existing industrial uses.	N/A
Community Consultation	38	<ul style="list-style-type: none"> Only 4-5 people surveyed, one doesn't live in NSW False claims: "no net loss of trees" when removing 509, planting 143 Friends of Lane Cove NP (400 members, 7,500 volunteer hours) not consulted Mayor of Ryde requested extension due to deceptive consultation Many residents unaware until exhibition period 	Extensive consultation has been undertaken by Willowtree Communications since the Response to Submissions stage has commenced. Of note, this included consultation with Friends of Lane Cove, who were supportive of the amendments proposed.	Engagement Report (Appendix DD32).



TABLE 16: RESPONSE TO COMMUNITY SUBMISSIONS				
Key Issue	No. of Submissions	Main Concerns Raised	Response	Supporting Appendix / Section
Biodiversity Offsets Inadequacy	45	<ul style="list-style-type: none"> Samuel Review (EPBC Act) proves offsets don't maintain biodiversity M7 motorway credits from 20 years ago still unrealised Rocky outcrops and caves cannot be offset - irreplaceable microbat habitat Local wildlife can't relocate to distant offset sites Violates BC Act requirement to avoid/minimize before offsetting 	An amended BDAR has been prepared with consideration to habitat retention and reflects the amended development which has significantly reduced vegetation loss on site.	Architectural Plans (Appendix DD2) Landscape Drawings (Appendix DD11) Landscape Report (Appendix DD12) Biodiversity Development Assessment Report (Appendix DD15)



PART 6 ASSESSMENT OF IMPACTS

This chapter provides a summary of the additional assessments undertaken to assess the amended proposal.

6.1 ASSESSMENT APPROACH

Section 7 of the EIS provides an assessment of the key environmental issues for the project as identified in the SEARs issued.

The amended proposal, as described in **Section 2** of this report, has been assessed against each of the key issues as identified in the SEARs. Consideration of the potential environmental, social and economic impacts of the proposed amendments was undertaken as part of the development of the revised scheme and an assessment made of the potential changes as compared to the environmental impacts described in the EIS.

Where no material change in impact was identified, this aspect was not considered further as part of the assessment of each of the proposed amendments and refinements. This includes site-specific investigations, such as groundwater assessments and preliminary site investigations. No new environmental issues were identified during the assessment for the amendments and refinements.

To support the additional impact assessment, updated technical reports and/or addendum letters are provided – refer to Appendices.

The following subsections provide an updated assessment of potential impacts, with consideration of the amended proposal, as described in **PART 3** of this Amendment Report.

TABLE 17 is included to recognise the SEARs for SSD-80018208, dated 20 February 2025, and those matters that have been reassessed.

TABLE 17: UPDATE ON SEARs ITEMS			
SEARs Item		Updated Assessment	Appendix
1.	Statutory Context	Refer to PART 4 of this Amendment Report.	N/A
2.	Estimated Development Cost and Employment	Refer to Section Error! Reference source not found. of this Amendment Report.	Appendix DD1
3.	Design Quality	Refer to Section 6.2.1 of this Amendment Report.	Appendix DD2
4.	Built Form and Urban Design	Refer to Section 6.2.2 of this Amendment Report.	Appendix DD2 and Appendix DD3
5.	Visual Impact	Refer to Section 6.2.3 of this Amendment Report.	Appendix DD7
6.	Traffic, Transport and Accessibility	Refer to Section 6.2.4 of this Amendment Report.	Appendix DD8
7.	Trees and Landscaping	Refer to Section 6.2.5 of this Amendment Report.	Appendix DD11 and Appendix DD12



TABLE 17: UPDATE ON SEARs ITEMS			
SEARs Item		Updated Assessment	Appendix
8.	Ecologically Sustainable Development	Refer to Section 6.2.6 of this Amendment Report.	Appendix DD13
9.	Biodiversity	Refer to Section 6.2.7 of this Amendment Report.	Appendix DD15
10.	Back-up Power System	Refer to Section 6.2.8 of this Amendment Report.	Appendix DD16
11.	Air Quality	Refer to Section 6.2.9 of this Amendment Report.	Appendix DD17
12.	Noise and Vibration	Refer to Section 6.2.10 of this Amendment Report.	Appendix DD18
13.	Ground and Water Conditions	Refer to Section 6.1.12 of EIS	N/A
14.	Water Management	Refer to Section 6.2.13 of EIS.	Appendix DD21
15.	Flooding Risk	Refer to Section 6.2.12 of this Amendment Report.	Appendix DD22
16.	Hazards and Risks	Refer to Section 6.1.15 of EIS	Appendix DD23
17.	Contamination and Remediation	Refer to Section 6.1.16 of EIS	Appendix DD24
18.	Waste Management	Refer to Section 6.1.17 of EIS	Appendix DD25
19.	Aboriginal Cultural Heritage	Refer to Section 6.1.18 of EIS	Appendix DD26
20.	Environmental Heritage	Refer to Section 6.1.19 of EIS	Appendix DD27
21.	Social Impact	Refer to Section 6.2.13 of this Amendment Report.	Appendix DD28
22.	Infrastructure Requirements and Utilities	Refer to Section 6.1.21 of EIS	Appendix DD29
23.	Bushfire Risk	Refer to Section 6.1.22 of EIS	Appendix DD30
24.	Construction, Operation and Staging	Refer to PART 3 of this Amendment Report.	Appendix DD29
25.	Contributions and Public Benefit	Refer to Section 6.1.24 of EIS	Appendix DD31
26.	Engagement	Refer to PART 5 of Amendment Report	N/A

6.2 UPDATED ASSESSMENT OF IMPACTS

This section provides a summary of the findings of any further assessment of the impacts of the proposed modifications, including details about the impacts of the modifications and the impacts of the modified project. It should be read in conjunction with Part 6 of the EIS.

6.2.1 Design Quality

The revised proposed development continues to achieve good design in accordance with the objectives for good design in Better Placed, as documented in the Architectural Design Report (**Appendix DD3**), and extracted below:



<p>Better Placed is an integrated design policy for the built environment of NSW.</p>	<p>Objective 01. <u>Better fit.</u></p>	<p>Objective 02. <u>Better performance</u></p>	<p>Objective 03. <u>Better for community</u></p>
<p>It reflects the shared aspirations and expectations for the spaces where we live, work, and interact. The policy establishes a clear framework to guide the creation of good design, ensuring the architecture, public spaces, and environments we build today meet our needs and will continue to serve future generations.</p>	<p>The design responds carefully to the site's characteristics, including its topography and surrounding land use. By positioning the building in a manner that minimises its height and visual impact, the design ensures minimal disruption to the local environment. The surrounding native vegetation is preserved to maintain ecological value and contribute to local biodiversity.</p>	<p>The data centre is designed to meet high-performance standards, including compliance with Uptime Institute Tier III standards, ensuring continuous operation with redundant power and cooling systems. This guarantees secure data processing while adapting to increasing demands over time. Energy-efficient technologies and water-saving systems reduce the environmental footprint and operational costs.</p>	<p>The design prioritises positive impacts on the surrounding community by enhancing the local streetscape and improving accessibility. Landscaping along the building's perimeter softens its appearance, improving the visual amenity of the surrounding area. The integration of an east-west access road facilitates better pedestrian and vehicular movement across the site.</p>
<p>The Better Placed Design Policy identifies seven main objectives:</p> <ul style="list-style-type: none"> - Better fit - Better performance - Better for community - Better for people - Better working - Better value - Better look and feel 	<p>The integration of an east-west access road improves circulation and connectivity, linking key access points and providing better access for both pedestrians and vehicles. This ensures clear separation between operational and public zones, complementing the surrounding employment precinct.</p>	<p>Durability is ensured through robust materials and high-performance mechanical and electrical systems, optimised for data centre use. The design also incorporates resource optimisation and waste minimisation, making it environmentally responsible and economically viable in the long term.</p>	<p>Landscaped zones and outdoor seating areas create spaces for relaxation and public interaction, contributing to the local community's overall experience. This thoughtful design ensures the data centre is more integrated with the broader environment, benefiting both workers and the public.</p>
<p>Objective 04. <u>Better for people</u></p>	<p>Objective 05. <u>Better working</u></p>	<p>Objective 06. <u>Better value</u></p>	<p>Objective 07. <u>Better look and feel</u></p>
<p><u>Safe, comfortable and livable</u></p>	<p><u>Functional, efficient and fit for purpose</u></p>	<p><u>Creating and adding value</u></p>	<p><u>Better look and feel</u></p>
<p>The design focuses on creating a comfortable and engaging environment for staff and visitors. Office and administration areas face outward, maximising solar access and natural light, promoting a healthier work environment. Extensive glazing allows for visual connection with the surrounding environment, encouraging openness and enhancing the interior experience.</p>	<p>Functionality is central to the data centre's design, ensuring operational efficiency and security. The facility supports modular data halls for scalability, with redundant power and cooling systems to guarantee reliability. The layout clearly separates public, staff, and operational areas, maintaining security while facilitating a smooth flow of people and resources.</p>	<p>The design delivers long-term value through energy-efficient technologies and the selection of durable materials, reducing operational costs and environmental impacts. The use of low-maintenance systems and high-performance mechanical and electrical features ensures that the facility will remain functional and economically viable for years.</p>	<p>The visual quality of the data centre is enhanced through careful design, using natural materials and a restrained colour palette that allows the structure to blend into the existing urban fabric. Landscaping around the building softens its appearance and contributes to the overall aesthetic while improving ecological quality.</p>
<p>The dynamic entry and clear signage improve navigation, ensuring that both staff and visitors can easily find their way around. Breakout areas in landscaped zones provide informal meeting spaces, contributing to employee wellbeing and fostering a welcoming environment.</p>	<p>The integration of an east-west access road enhances site circulation, providing clear routes for pedestrians and vehicles while reducing disruptions. The design ensures that the data centre's core operations align with the broader context of the employment precinct, creating a safe and efficient environment.</p>	<p>In addition, compliance with Tier III standards guarantees operational efficiency and scalability. This long-term value extends to the surrounding area, contributing to the area's ongoing development.</p>	<p>Dynamic entry points and outdoor seating areas improve the user experience, making the data centre feel welcoming and connected to the community. These features ensure that the development enhances the visual and functional quality of the surrounding precinct while maintaining a strong identity.</p>

Figure 14: Design Response, Better Placed (Greenbox, 2025)

6.2.2 Built Form and Urban Design

The amended design and subsequent overall reduction in facility capacity results in improvements in the built form and urban design including:

- **Increased setback from Julius Avenue** – increases from 5m to 6m on the following frontages:
 - 6m to Julius Avenue;
 - 6m to south-western side; and
 - 6m to north-eastern side.
- **Reduced building bulk** – a reduction in GFA to 16,647m², as well a reduction in the overall amount of building storeys (from six [6] to four [4]).
- **Relocated STSS** - moved to west of building, rather than the previous isolated location adjacent to Richardson Place.
- **Removal of basement parking** – reducing the amount of cut required and allowing for an overall reduction of stories.



Alternatives Considered

Several different configurations were assessed for the data centre and generator structure to avoid and minimise impacts to the landscape setback zone to the South end of the site, also noting that the landscape setback zone is not an exact surveyed area in the Macquarie Park Design Guide hence it is understood that there remains to be flexibility in the specific border to this zone. It is considered that the design amendment complies with the intent of the Macquarie Park Design Guide.

The current design reflects the lowest impact arrangement to existing bushland for the built elements. The generator building requires physical separation from the Data Centre building to allow sufficient airflow to both the stacked generator sets as well as to avoid recirculation to the rooftop chillers. The separation also assists with effective dispersion of generator exhaust flues. The team has undertaken multiple rounds of Computational Fluid Dynamics (CFD) analysis to verify this, and results have shown that any reduction in generator and building separation will lead to significant intake pressure build up and will potentially starve the generator intake. The mechanical and electrical engineering advice suggested that the arrangement (reduction in separation) would not be fit for purpose or functionally compliant.

A performance solution has been implemented for bushfire protection to minimise APZ impacts on existing bushland for both the Data Centre and Generator Structure elements.

It is also not viable to use a taller building form to offset the plant area. Data Centres rely on maximising rooftop area for mechanical cooling plant, and a reduction in this available area would have a material impact on the cooling capacity of the facility. The facility capacity has already reduced by approximately 34% from the original submission (115MW IT load to 76MW IT load) as part of the Design Amendment addressing Submissions issues and is unable to be reduced any further without impacting project viability.

The site itself is constrained in its entry, contours and geometry, which then largely dictate a viable block arrangement for the sub-elements including office, loading dock/carpark, data halls/electrical rooms, STSS and generator building. The Data Halls have specific design configuration requirements that require a fixed footprint for data hall area, adjacent mechanical cooling area and linear electrical infrastructure rooms. Viability of the design relies on this fixed arrangement and generally means that large rectangular sites are best suited to data centre layouts. The site area does not physically allow alternative positioning of the generator building without a material detrimental impact on the facility capacity, airflow requirements and acoustic requirements.

6.2.3 Visual Impact

An amended Visual Impact Assessment (VIA) has been prepared by Geoscapes (Refer to **Appendix DD7**). The VIA was informed by a collation of desktop analyses, a site inspection, drone photography and a series of verified photomontages. Visual impacts have been assessed from twenty-five (25) representative viewpoints selected in accordance with the SEARs, including views from major roads, public open space, bushland corridors, adjoining commercial buildings and residential areas to the south and west at both lower and higher elevations.

Changes to the data centre's operational capacity have resulted in a reduction in overall building height, including the removal of two levels. This refinement has reduced the scale and visibility of the development from surrounding locations and has led to lower visual impact ratings across the majority of viewpoints assessed.



AMENDMENT REPORT

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

Viewpoint No.	Viewing Location	Sensitivity	Original Scheme – Significance of Visual Impact	Revised Proposal – Significance of Visual Impact	Summary of Change
VP1	Epping Road, Lane Cove West	Medium	Moderate/minor	Minor	Reduction in visual impact
VP2	Margaret Place, Lane Cove North	High	Moderate/minor	Minor	Reduction in visual impact
VP3	Int of Mowbray Road & Whitfield Ave, Lane Cove North	High	Moderate	Moderate/minor	Reduction in visual impact
VP4	Close to Jct of Epping Road & Mowbray Road, Lane Cove North	Low	Moderate/minor	Minor	Reduction in visual impact
VP5	Rotary Athletics Field, Lane Cove North	Medium	Minor	Minor	No change
VP6	Lane Cove River, Lane Cove North	High	Moderate	Minor	Reduction in visual impact
VP7	Opposite Track to Great North Walk, North Ryde	Low	Moderate	Moderate/minor	Reduction in visual impact
VP8	Level 3 - City of Ryde Council Offices	Low	Minor negligible	Minor negligible	No change
VP9	Richardson Place, North Ryde (City of Ryde Council)	Medium	High/Moderate	Moderate	Reduction in visual impact
VP10	Level 2 - Honeywell, Richardson Place, North Ryde	Medium	Moderate	Moderate	No change
VP11	Level 7 - Oracle Building, Julius Ave, North Ryde	Medium	High/Moderate	High/Moderate	No change
VP12	Int of Julius Ave & Newbiggin Close, North Ryde	Medium	Moderate	Moderate/minor	Reduction in visual impact
VP13	The Village - Riverside Corporate Park, North Ryde	Medium	High/Moderate	Moderate	Reduction in visual impact
VP14	Childcare Centre, 5A Julius Ave North Ryde	Low	Minor	Minor	No change
VP15	5 Julius Ave, Julius Ave, North Ryde	Medium	High/Moderate	Moderate	Reduction in visual impact
VP16	Julius Ave (on approach from west), North Ryde	Medium	Moderate/minor	Moderate/minor	No change
VP17	BOC, 10 Julius Ave, North Ryde	Medium	High/Moderate	Moderate	Reduction in visual impact
VP18	Level 2, 10a Julius Ave, North Ryde	Low	Moderate	Moderate/minor	Reduction in visual impact
VP19	Ryde Garden Apartments, North Ryde	Medium	Minor	Minor	No change
VP20	Close to No.30 Warwick Street, North Ryde	High	Moderate/minor	Minor	Reduction in visual impact
VP21	Driveway of No.18 Gilda Street, North Ryde	Medium	Minor	Negligible	Reduction in visual impact
VP22	Pittwater Road, North Ryde	High	Moderate	Moderate/minor	Reduction in visual impact
VP23	Lane Cove Valley Walk, Lane Cove North	Medium	Moderate/minor	Minor	Reduction in visual impact
VP24	Great North Walk, North Ryde	High	N/A	Moderate/minor	Not previously assessed
VP25	Shortcut Track, North Ryde	Medium	N/A	Minor negligible	Not previously assessed

Figure 15: Comparison of Visual Impacts (Geoscapes, 2025)

The assessment concludes that the revised proposal would generate visual impacts ranging from moderate/high to minor or negligible, depending on distance, elevation, viewing angle, duration, and intervening screening. Significant impacts are largely confined to adjacent commercial buildings with direct sightlines. From moderate to greater distances—including residential areas, the Lane Cove River corridor, the Great North Walk, and bushland trails—impacts are minor or negligible, as topography and vegetation filter or block views, allowing the development to blend into the broader landscape. Maturing landscaping will further integrate the development and reduce its visual prominence.

6.2.4 Traffic, Transport and Accessibility

An amended Transport Impact Assessment has been provided at **Appendix DD8** inclusive of responses to submissions. Relevance to each item below has been extrapolated.

Traffic

The distribution of traffic generated by the proposed development has been determined based on expected staff travel behaviour, the site access arrangement and the structure of the surrounding road network. All vehicle movements will occur via the single site access driveway on Julius Avenue.

Given the nature of data-centre operations, peak-hour activity is driven by staff shift changes. To reflect typical commuting patterns, the following inbound and outbound proportions have been adopted for assessment, as requested by Council:

- AM Peak (Staff Arrival Period)
 - 90% inbound.
 - 10% outbound.
- PM Peak (Staff Departure Period)
 - 10% inbound.



- 90% outbound.

The TIA determined that the amended development Generate relatively low traffic volumes that result in acceptable performance outcomes at the surrounding intersections, with only minor additional impact at locations that are already near or at capacity in the future base case.

Access

Vehicular access to the development will be provided via the existing shared driveway located on the western side of the site, which is shared with 10 Julius Avenue. This driveway will function as the sole entry and exit point for all staff, visitors and service vehicles.

The shared driveway connects directly to Julius Avenue, which provides access to Delhi Road and the broader Macquarie Park road network. The access arrangement is simple, legible and appropriate for the low and predictable traffic volumes generated by data-centre operations.

The extension of Richardson Place has been removed due to several identified factors, including:

- The parking bays at the existing cul-de-sac of Richardson Place remain unaffected by the proposed development;
- Based on consultation undertaken with the City of Ryde, their preference was not for Richardson Place to remain as is.
- The consequential ability to reduce the extent of vegetation clearing on site;
- The smaller footprint of the amended development is not considered to be of a scale to require such an extension; and
- The topography of the land where the proposed Richardson Place extension was located was of a considerable gradient.

Servicing for the proposed data centre has been designed to accommodate the low and predictable level of service activity typical of this land use. The site provides dedicated servicing areas on the ground floor, accessible via the shared driveway on Julius Avenue.

The development includes provision for two Medium Rigid Vehicles (MRVs) to service the facility. These bays will support scheduled maintenance, equipment deliveries, specialist data centre contractors and periodic mechanical or electrical servicing requirements.

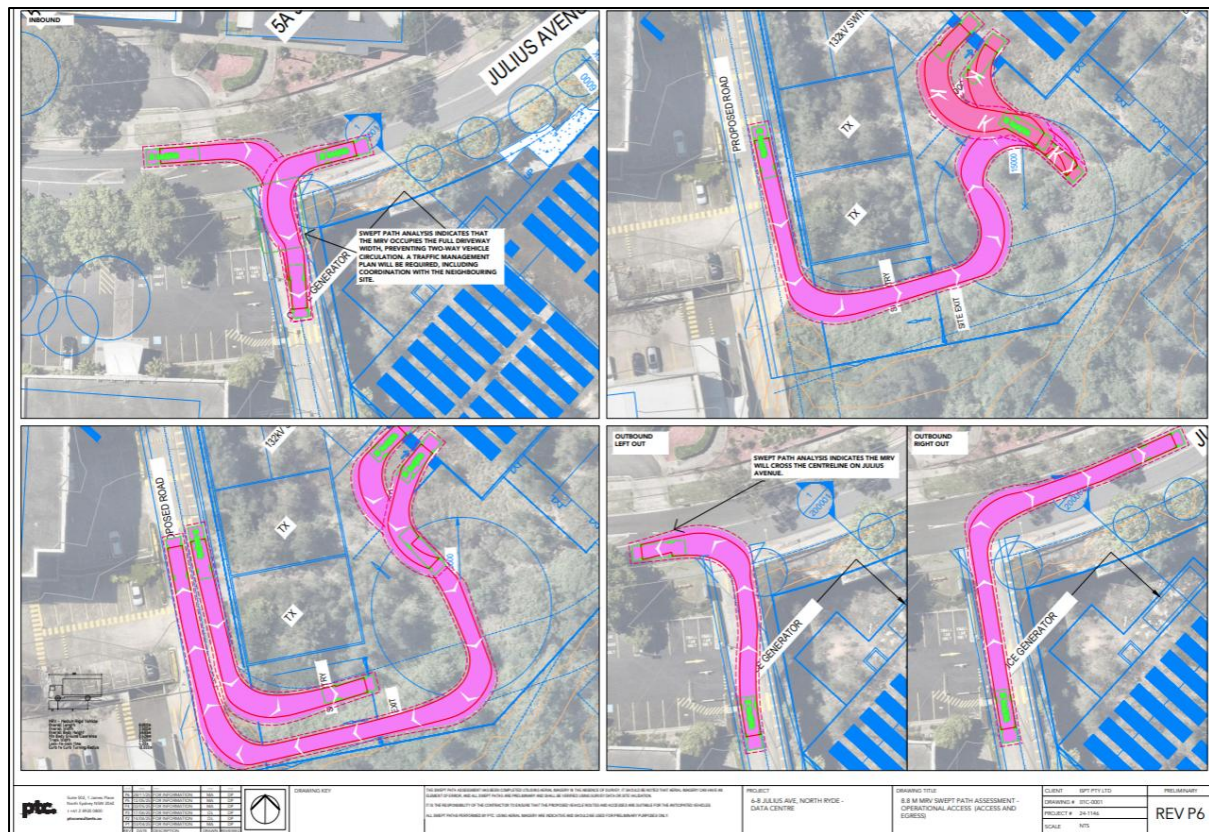


Figure 16: Swept Path Analysis (PTC, 2025)

Parking

The development will provide 38 on site car parking spaces, including two accessible spaces. This is reflective of the 38 staff expected on site (inclusive of visitors and contractors). It is acknowledged that this provision is below the City of Ryde DCP maximum parking rate for industrial development in the Macquarie Park Corridor and has been tested against a conservative first principles assessment that assumes 100% of staff drive to the site and park on site.

Under this scenario, the 38 spaces are sufficient to accommodate staff parking as well as the low and intermittent contractor and visitor demand. The 100% staff driving scenario does not factor in alternative methods such as public transport, bicycle parking and the like. Accessible parking, bicycle parking and end of trip facilities have been designed to comply with the requirements of the National Construction Code, the City of Ryde DCP and relevant Australian Standards to promote alternative travel methods for future attendees of the development.

Mitigation Measures

- A preliminary Construction Traffic Management Plan has been provided to guide detailed planning post-approval. This will be updated prior to construction.
- An Operational Traffic Management Plan (OTMP) will be prepared in coordination with future tenants.
- A Green Travel Plan has been prepared to encourage sustainable travel choices for future occupants.

6.2.5 Trees and Landscaping

Landscaping was considered in the original EIS at Section 6.1.7. Updated Landscape Drawings and Reporting are provided at **Appendix DD11** and **Appendix DD12**.



The revised proposal will result in an improved landscaping built form, attributed by the considerable retention of existing vegetation and removal of the existing (as previously identified within **Section 3.4.3**).

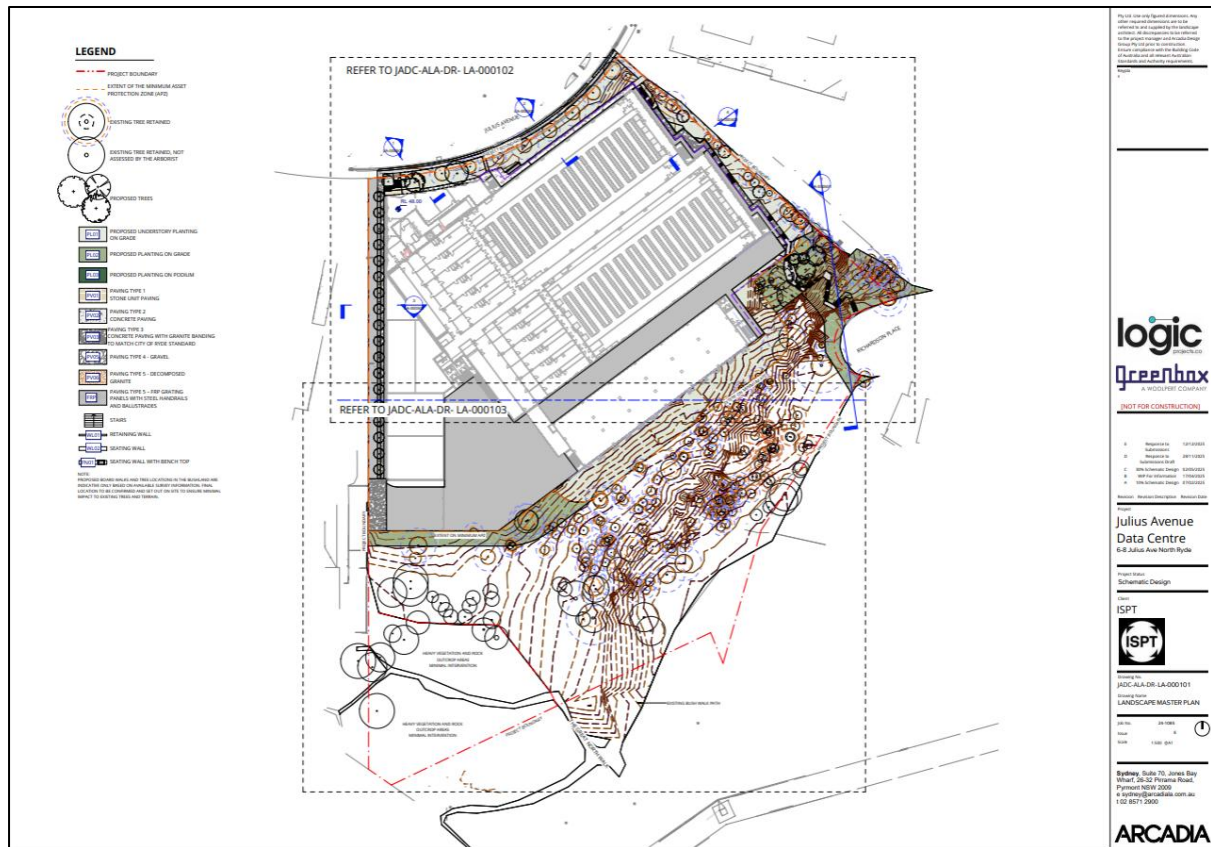


Figure 17: Landscape Site Plan (Arcadia, 2025)

The revised proposal will provide 49.8% deep soil landscaping, as detailed in the landscaping area calculation provided in the Architectural Plans at **Appendix DD2**.

This amended design addresses concerns raised regarding the visual impact and removal of existent vegetation. Additionally, the amended development has removed the western pedestrian path based on consultation with authorities and community groups, namely Friends of Lane Cove National Park. There remains a pedestrian link to the east of the site between Julius Avenue and the Great North Walk nevertheless.

6.2.6 Ecologically Sustainable Development (ESD)

An ESD Report is appended to this amendment (**Appendix DD13**), which provides specific detail as to how the amended development responds to:

- Reduction of greenhouse gas emissions and approach to net zero emissions;
- Reduction of water use intensity;
- Resilience;
- Industry recognised sustainability performance; and
- Measurement of embodied emissions.

The report outlines how when compared to the previous scope of the development, the amended development:

- Reduces total GHG emissions by approximately 27% through a lower IT load and total annual energy use reduction of 413,736 MWh;



- Significantly reduces the strain on local water infrastructure through use of waterless heat rejection, saving approximately 1.3 million kilolitres of water per year compared with the previous proposal.

Design finalisation will ensure that the following matters will be addressed:

- Circular economy;
- Industry recognised rating; and
- Maximising reduction in embodied emissions.

6.2.7 Biodiversity

An amended BDAR has been prepared by SLR Consulting to accompany the amendment, refer to **Appendix DD15**. It reconfirms that no Matters of National Environmental Significance are recorded on the subject site based on a self-assessment in accordance with *Matters of National Environmental Significance Significant Impact Guidelines 1.1*,

Additionally, the revised layout of the development has quantified a reduction in ecosystem credits (from 25 to 14) and species credits (from 145 to 75). An assessment of the BDAR requirements has also been amended in line with revisions to the proposed development. Further, a detailed options analysis has been undertaken, of which is extrapolated upon within **Section 7.1.5.36.2.7**.

6.2.8 Back-up Power System

This section of the amendment provides further details relating to the proposed back-up power system, as requested by the SEARs, addressing the following specific matters:

- Provide a detailed overview of any proposed back-up power system, including the scale and capacity of the system, and any associated testing procedures (frequency and duration).
- Provide a detailed justification for the proposed back-up power system, including alternatives considered.

In order to operate successfully the development is required to demonstrate it can provide sufficient operational resilience such that in the event of a failure, crisis or catastrophic event the data centres can continue to operate and maintain normal business operation in accordance with agreed business arrangements.

The rationale behind the proposed generator gantry being separated from the data centre building has been addressed within **Section 6.2.2**. A Technical Note has been prepared to outline the proposed back-up power supply reflecting the amended development and is provided at **Appendix DD10**.

6.2.9 Air Quality

An Air Quality Impact Assessment (AQIA) was prepared by Northstar to support the original proposal and has since been revised to reflect the amended development. The AQIA has concluded that:

“the normal operation of the Proposal is not considered likely to result in additional exceedances of the relevant air quality criteria at any identified receptor location.”

Additionally:

“the predicted incremental concentrations for all assessed pollutants are shown to be below the relevant criteria under realistic operations where the back-up generators are operated under an appropriate testing schedule”

The reduction in facility capacity has ensured a more desired developmental outcome with regard to air quality is achieved.



6.2.10 Noise and Vibration

An amended Noise and Vibration Impact Assessment (NVIA) was prepared by Arup to assess the potential noise impacts associated with the development in its amended form (refer to **Appendix DD18**)

6.2.10.1 Operational Noise

The operational noise assessment has carried out noise predictions in accordance with the *NSW Noise Policy for Industry* (NPfI). The assessment identified the noise sensitive receivers, overall site criteria, noise sources and noise mitigation measures. Operating conditions were defined for normal operations and maintenance operations including generator testing.

Predicted results indicate that with the implementation of the indicative noise mitigation measures presented by Arup, the noise emissions from the project comply with the overall site noise criteria during both normal operations and maintenance operations at all receivers under standard and enhanced weather conditions.

The operational noise mitigation measures recommended are outlined within **TABLE 18** below.

TABLE 18: NOISE MITIGATION MEASURES	
Item	Mitigation Measures
Equipment / plant	Select equipment with sound power no more than listed in Table 13.
Rooftop plant room	Intake attenuators – NAP H series (550 mm module width): <ul style="list-style-type: none"> ▪ 2.4 m length on northwest façade ▪ 1.2 m length on southeast, southwest and northeast facades Roof and wall panels: <ul style="list-style-type: none"> ▪ Steel / lightweight cavity construction with insulation Rw (C; Ctr): 30 (-2; -4) dB Internal lining: <ul style="list-style-type: none"> ▪ Rockwool 50 mm on internal walls
Air-cooled chillers	<ul style="list-style-type: none"> ▪ Selection of air-cooled chiller with sound power no more than listed in Table 13 of Appendix DD18. ▪ Discharge attenuator – NAP H series (550 mm module width) – 2.1 m length ▪ Setback of chiller operation during low ambient conditions at night
Generators	<ul style="list-style-type: none"> ▪ Data hall generators contained within generator plant room. ▪ Admin / FOH generator contained in acoustic enclosure ▪ Attenuators to discharge and intake. ▪ Muffler/silencer to exhaust.
Load bank	Contained within an acoustic enclosure (see Table 13 of Appendix DD18 for maximum noise levels)
Transformers	Selection of transformer plant with sound power no more than listed in Table 13 of Appendix DD18 Noise walls around transformer bays to be minimum heights as shown in Figure 3 based on transformer height of 3 m above ground level. Noise wall is to be: <ul style="list-style-type: none"> ▪ Solid gap-free wall (i.e. no gaps at base of wall and between panels) Minimum density of 15 kg/m ³ (e.g. 1 x 9 mm fibre cement sheeting)
Variable Refrigerant Flow condensers	Selection of condenser plant with sound power no more than listed in Table 13 of Appendix DD18 . Solid plant screen / noise wall around the Level 5 rooftop Admin VRF condensers and around the Level 2 western VRF condensers as shown in Figure 3. Noise wall is to be:



TABLE 18: NOISE MITIGATION MEASURES

Item	Mitigation Measures
	<ul style="list-style-type: none"> ▪ Minimum 3 metres in height above roof level ▪ Solid gap-free wall (i.e. no gaps at base of wall and between panels) Minimum density of 15 kg/m ³ (e.g. 1 x 9 mm fibre cement sheeting)
Precision air handling units (AHU)	Selection of AHU plant with sound power no more than listed in Table 13 of Appendix DD18 .
Service vehicles (heavy vehicles)	Service vehicles and trucks to be operated on site during day hours Service vehicles and trucks to be turned off while being unloaded

The NVIA has also assessed several receivers, inclusive of 11 residential receivers (RES1-RES11), as well as the following nearby additional uses:

- Hotel/motel (HOT1);
- Childcare Centre (CC1 and CC2);
- Passive recreation (REC1); and
- Commercial (COM1-COM15).

It has been closed that noise emissions from the project in its revised form comply with the overall site noise criteria during normal operations.

6.2.10.2 Construction

Potential vibration and acceleration impacts were assessed to determine typical levels within a set distance of the activity to receivers from construction.

Criteria have been established in accordance with the *NSW Interim Construction Noise Guideline (ICNG)* and *Assessing Vibration: a technical guideline*. Predicted noise levels indicate that noise management levels are likely to be exceeded albeit only for intermittent periods during standard hours and mainly during the early stage of construction until the building structure is complete. Regarding vibration, should any sensitive structures be identified within the minimum working distances, mitigation measures, to be adhered to by the relevant contractor (Refer to Section 6.6 of **Appendix DD18**).

Mitigation measures recommended include:

- Preparation of a Construction Noise and Vibration Management Plan (CNVMP);
- Provision of temporary noise barriers;
- Undertaking of ongoing community consultation;
- Undertaking of on-site staff training to assess emissions;
- Locate site accesses and loading areas away from noise sensitive receptors where practicable;
- Undertaking of routine condition surveys;
- Scheduling of work between approved work hours, factoring in restrictions pertinent to certain equipment/activities; and
- Ongoing noise and vibration monitoring.

6.2.11 Water Management, Ground and Water Conditions

A Civil Engineering Report (inclusive of a water management plan) has been prepared by TTW (refer **Appendix DD21**) and forms a central component of the Integrated Water Management Plan.

6.2.11.1 Stormwater

The existing site is acknowledged to be 100% impervious and comprised of undeveloped vegetation and exploratory geotechnical investigations. The existing Richardson Place cul-de-sac stormwater



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drainage pipe network (in the southeast) conveys a large portion of the existing stormwater catchment between the City of Ryde building in the south and Delhi Road in the north.

Stormwater discharge from Richardson Place flows into an existing detention basin situated to the south of council's head office building. This basin then discharges via an overflow weir into an overland flow path and eventually into the Lane Cove River.

Stormwater has been designed in accordance with the RDCP2014 and the *Stormwater Management Technical Manual 2014*. Outflows from the site for all design storms are required to be less than the maximum outflow for the uncontrolled post-development site in the 5-year Annual Recurrence Interval (ARI) which is equivalent to the 20% Annual Exceedance Probability (AEP) storm event.

Roof catchments will be collected in roof gutters and conveyed by downpipes to an in-ground pipe system. Surface stormwater flows have been conveyed by site grading and collected by Surface Inlet Pits (SIP). In-ground stormwater is conveyed to the on-site detention (OSD) system and water quality treatment devices. The proposed development will include an OSD tank to meet the discharge requirements set by the council. An OSD tank with an effective minimum volume of 450 cubic metres is proposed. The OSD tank outlet will discharge through a level spreader. The proposed OSD and drainage plan has been modelled through the program DRAINS in line with Council requirements.

Stormwater runoff from the site is proposed to be treated through a combination of a rainwater reuse tank, pit-insert filter baskets, and filtration cartridges. Overflow from the rainwater tank will discharge to the filter chamber within the OSD tank. Storm filter cartridges are to be provided within the OSD filter chamber and will be used to target pollutant loads.

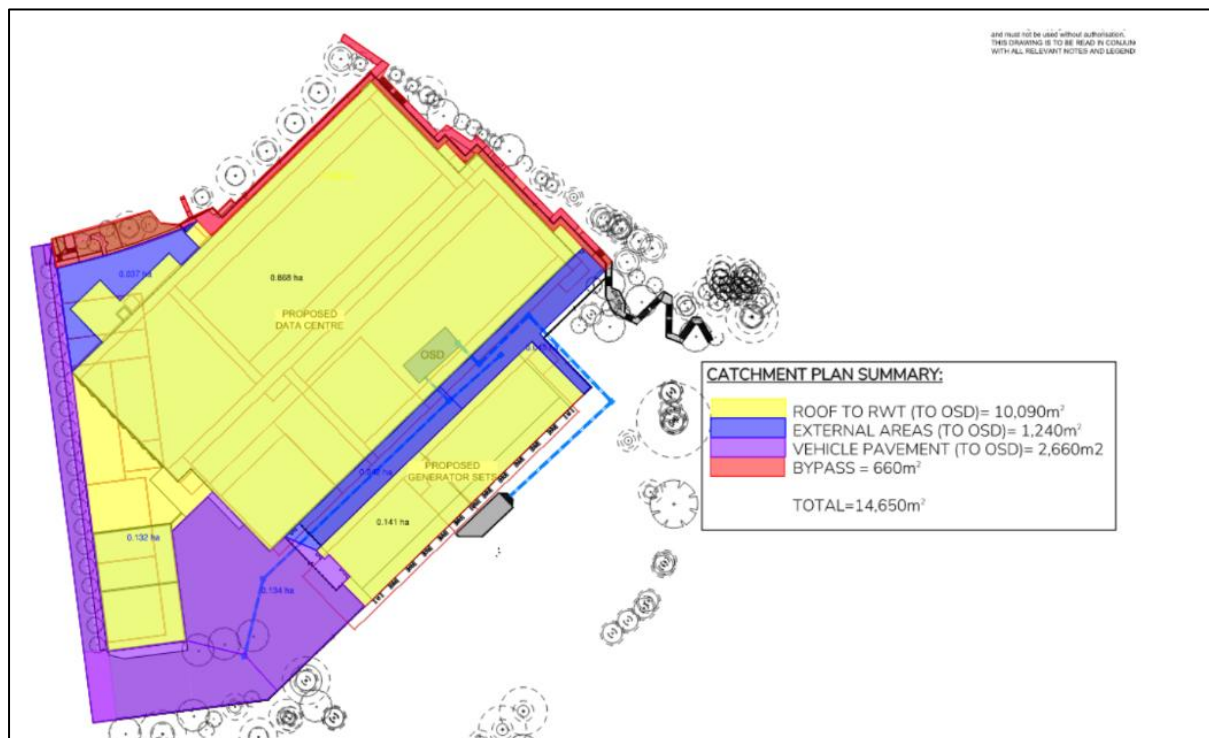


Figure 18: Catchment Plan (TTW, 2025)

Cut and Fill

The site requires cut and fill to ascertain the amended development footprint. Resulting in a net cut of approximately 9475m³, as identified in **TABLE 19** below.



TABLE 19: CUT AND FILL VOLUME ANALYSIS	
Total	Volume (m³)
Cut	-12328.28
Fill	2853.27
Net (Cut)	-9475.01

The design of external pavements within the site will be undertaken in future stages to ensure they provide adequate strength and safety for both pedestrian and vehicular movements.

Wastewater and On-site Sewerage Management

A new single sewer connection is required to service the building. Sydney Water's Section 73 Notice of Requirements (NoR) confirms that the existing 225mm diameter sewer infrastructure has sufficient capacity to accommodate the amended development's significantly reduced sewer loads of 99.7%.

A dedicated fire water drainage system has been incorporated to divert fire water to a detention tank when any sprinkler control valve serving areas containing lithium-ion batteries (whether energised, de-energised, or in any other state) is activated, in accordance with Dangerous Goods assessment requirements. The fire water containment tank operates as an independent system, collecting water discharged during internal fire events from data halls and battery rooms. Trench grates installed at exit doors capture the water and convey it by gravity to the detention tank. A reflux valve will be installed upstream of the tank to prevent tank water from backing up into the lowest data hall during overflow conditions. The fire containment detention tank will feature a camlock connection on an external wall of the loading dock to facilitate authorised removal of contaminated wastewater by vacuum truck.

6.2.12 Flooding Risk

An amended Flood Impact Risk Assessment (**Appendix DD22**) has been prepared by TTW. The updated civil design proposes reduced fill and earthworks along Julius Avenue and the access road. As a result of these design amendments, the revised modelling indicates no afflux along Julius Avenue; therefore, no drainage upgrades are required. The drainage upgrade works previously proposed were intended to mitigate afflux associated with the earlier design and are no longer required under the updated layout.

6.2.13 Social Impact

An amended Social Impact Assessment (SIA) has been prepared by Willowtree Communications support of the development and is provided at **Appendix DD27**. The SIA has been developed with consideration of the *Social Impact Assessment Guideline for State Significant Projects* (2021a) (the SIA Guideline).

The SIA reaffirms that the proposed development is likely to deliver significant long-term social and economic benefits by providing digital infrastructure to meet increasing demand. While there are some potential negative social effects, these are being addressed through the implementation of recommended mitigation strategies.

6.2.14 Engagement

Refer to **PART 5** of this Amendment Report.

6.3 UPDATED MANAGEMENT AND MITIGATION MEASURES

ISPT plans to undertake the construction and operation of the proposed data centre, in accordance with the planned management and mitigation measures, as updated within **Appendix C** of this Amendment Report.



PART 7 JUSTIFICATION OF AMENDMENT

7.1 JUSTIFICATION

This Amendment Report has responded to the key matters raised by the respondents in relation to the proposed development of the Julius Avenue Data Centre (SSD-80018208). The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. This Amendment Report is submitted on the following basis.

7.1.1 Supports State, Regional and Local Planning Objectives

The proposed development in its amended form consistent with the objectives, provisions and vision contained within A Metropolis of Three Cities – Greater Sydney Region Plan; North District Plan; the Ryde Local Strategic Planning Statement 2020; and the Future Transport Strategy 2056. The proposed development would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies, being the Macquarie Park Precinct

The Proposal is consistent with the 10 Directions and planning priorities described in the Region Plan, specifically in the following manner:

- Infrastructure and collaboration – once in operation, the development would be able to provide secure, reliable and adaptable solutions for cloud, content and large enterprise customers to house their high and rapidly growing volumes of data and information. The infrastructure has been designed to meet future needs.
- Liveability – the Proposal encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality.
- Productivity – the Proposal is situated within the *North District Plan* and will support the retention and efficient use of industrial land; and,
- Sustainability – the Proposal would not exhibit or emit any detrimental impacts to its wider ecological surroundings and is consistent with the principles of ESD.

The Proposal would contribute to the objectives set out in the *North District Plan* by promoting a greater range of land uses of benefit to the community including the proposed data centre and other commensurate land uses; facilitating the provision of greater and improved infrastructure; and, promoting additional employment-generating opportunities (relevant to the proposed development) to the wider locality and community closer to home, whilst supporting an economically and environmentally sustainable development.

Planning Priorities M1 and M2 of the Ryde LSPS seek to ensure the economic vitality of the Macquarie Park Health and Education Strategic Centre and retain the precinct's strong economic base as shown by its contribution to Australia's GDP. The Proposal represents a significant investment in the Precinct and will offer crucial data storage capacity near key health and education institutions, supporting the infrastructure needs of these sectors.

Planning Priority M6 and E1 seek to protect and enhance bushland, biodiversity, environmentally sensitive waterways, scenic and cultural landscapes. The Proposal involves significant enhancement to the bushland on the Site and protects important biodiversity.

7.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible response to the strategic goals and objectives of the Macquarie Park Precinct, which all envisage employment-generating land uses at this location.



The permissibility of the subject site for development as a data centre is prescribed by the RLEP2014, which describes such development as permitted with consent in the E3 Productivity Support zone.

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART 6** of the EIS and **PART 6** of this Amendment Report, which includes an analysis of all potential impacts, which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, sufficient access arrangements and its suitable contextual setting.

7.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully developed strategies are set out in detail for management and mitigation. These measures are described in **PART 6** and **Appendix C** of this Amendment Report.

The amended design will result in an improved environmental impact, as follows:

- Reduction in facility capacity from 115.2MW to 76MW.
- Air-cooled chillers have been proposed on a single rooftop level. This replaces the former water-cooled chiller level with rooftop cooling towers, alleviating operational water demand by approximately 99.7%.
- Reduction in the extent of tree removal from 509 trees to 334 trees.
- The STSS has been relocated adjacent to the data centre building, rather than in its former isolated location. The capacity of the STSS has also reduced to 120MW.
- The Richardson Place connection through the site has been removed, with access to loading areas and STSS proposed from Julius Avenue only.
- Removal of western pedestrian connection to the Great North Walk.
- GFA reduced to 16,647m².

7.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar industrial functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

7.1.5 Delivers Ecologically Sustainable Development

The Amendment Report includes a supporting ESD Report (Refer to **Appendix DD13** of this Amendment Report). The principles of ESD as outlined in Section 193 of the EP&A Regulation have been carefully considered in the formulation of this proposal in its amended form.

7.1.5.1 Precautionary Principle

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development. The proposed development will not result in any threat of serious environmental damage or degradation.



7.1.5.2 Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would improve the status of the subject site and contribute to the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

7.1.5.3 Conservation of Biological Diversity and Ecological Integrity

It has been established throughout this EIS that the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. Further, through the amended BDAR, an options analysis has been undertaken, which details measures to avoid and minimise impacts resulting from the proposed development.

The data centre building utilises existing site cut and adopts a maximisation of pre-disturbed land., With the vegetation and habitats within the subject site being degraded, and many of the threatened species that typically occur in such vegetation types were not detected. This in turn has reduced impacts to vegetation of a better condition in the southern portion of the subject site. Additionally, the connecting road has been removed and the substation and pedestrian pathways have been relocated away from the native vegetation in the southern portion of the site. The substation has been moved to the basement of the data centre. Construction of the substation in this new proposed underground location will not require the removal of any native vegetation.

No other locations were considered available for consideration as part of the proposed development. Consequences of the proposed removal of rock outcrops (containing crevices, overhangs and small caves) and exotic vegetation were undertaken due to their potential to provide potential temporary roosting habitat for threatened species of birds and microbats. These features were inspected and did not display any evidence of microbat use. For the features unable to be avoided mitigation measures (such as pre-clearance surveys, clearing protocols) are proposed to minimise impacts to fauna during site clearing and development activities. Such measures are summarised below within **TABLE 20**.

TABLE 20: PROPOSED AVOIDANCE AND MINIMISATION MEASURES

Action	Outcome	Timing	Responsibility
Reduce the clearing requirement associated with the proposed development.	The APZ for the proposed data centre was reduced using performance criteria. The location of the proposed substation was adjusted to the east to reduce clearing of the moderate to good condition vegetation. The position of the substation was moved from the better condition vegetated southeast of the subject land to within the data centre footprint containing mostly low condition regrowth. Removal of connecting road between data centre and dwelling no longer required. Design change to pedestrian pathway.	Development Application / Post Approval / Construction Phase	Proponent



TABLE 20: PROPOSED AVOIDANCE AND MINIMISATION MEASURES			
Action	Outcome	Timing	Responsibility
Tree protection measures	Where necessary, the implementation of tree protection measures should be utilised to protect retained trees. This will reduce the potential for prescribed and indirect impacts as a result of the proposed development.	Construction Phase	Proponent, Arborist
Vegetation Management Plan	Enable protection and enhancement of retained vegetation and reduce the introduction and spread of weeds within the subject land.	Developed and approved before construction certificate	Proponent, Ecologist

7.1.5.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources require consideration of all environmental resources that may be affected by a proposal, including air, water, land, and living things. The development will not have any unacceptable environmental impacts in relation to air quality, water quality, or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.

The proposed development would enable operational efficiencies for the end user, through the provision of tailored design outcomes.

7.1.6 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the measures, which would be implemented throughout both the construction and operational phases of the proposed development.

7.1.7 Suitability of the Site

Having regard to the characteristics of the site and its location, the proposed development is suitable for the site for the reasons below:

- The subject site is located within an established precinct and is zoned E3 Productivity Support under the RLEP2014;
- The RLEP2014 allows for the proposed development as a permissible use;
- The proposed development would facilitate the intended use of the subject site for industrial purposes, which is consistent with the zoning and the surrounding context;
- The subject site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The proposed built form is designed to mitigate any impacts on surrounding properties; and
- The proposed development is consistent with strategic intent of the area.

The technical assessments prepared in support of the proposal have concluded that the site can be made suitable for the proposed development.

7.1.8 Public Interest

The proposed development is in the public interest as the proposed development provides:



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- A significant economic investment to the LGA of Ryde;
- Industrial services and business opportunities;
- Employment opportunities within the region during construction and operation;



PART 8 CONCLUSION

The EIS and this Amending Report have been prepared to assess the environmental, social, and economic impacts of the proposed data centre at 6-8 Julius Avenue, North Ryde.

The EIS and Amending Report has addressed the issues outlined in the SEARs and accords with Part 8 of the EP&A Regulation with regards to consideration of the relevant environmental planning instruments, built form, and social and environmental impacts resulting from the proposed development. The Amending Report discusses the changes to the design and provides further assessment of any key issues. Appropriate mitigation measures have been identified to manage the impacts of the development through the construction and operational phases of the project.

Having considered the detailed assessment undertaken in the EIS and the Amending Report the approval of this SSDA is recommended, subject to the implementation of suitable conditions of consent reflecting the recommended mitigation measures in **Appendix C**.



**APPENDIX A
AMENDED
PROJECT
DESCRIPTION**



PROJECT DESCRIPTION – SSD-80018208

Project:	State Significant Development Application (SSD-80018208) For: Julius Avenue Data Centre
Applicant:	ISPT Pty Ltd
Site:	6-8 Julius Avenue, North Ryde Lot 89 DP1082131

The particulars of the **original proposal** are summarised below:

- *Minor earthworks involving cut and fill works;*
- *Site preparation works, including tree clearing;*
- *Earthworks and additional site retaining;*
- *Infrastructure comprising civil works and utilities servicing;*
- *Construction of a multi-level data centre, with the following;*
 - *Basement car parking for 54 cars (including 2 accessible spaces);*
 - *12 data halls across six (6) 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;*
- *Provision for a future Ausgrid precinct-wide 132 KV STSS;*
- *One (1) new street through the southern part of the Site;*
- *Two (2) new pedestrian through-site links connecting Julius Avenue to the southern bushland;*
- *Complementary landscaping and offset planting;*
- *1,393m² of ancillary offices and associated amenities; and*
- *Hours of operation being on a 24 hours per day, 7 days per week basis.*

The proposed **amendment development** involves the following:

- *Minor earthworks involving cut and fill works;*
- *Site preparation works, including tree clearing;*
- *Earthworks and additional site retaining;*
- *Infrastructure comprising civil works and utilities servicing;*
- *Construction of a multi-level data centre, with the following;*
 - *Ground level loading dock, services plantrooms and car parking for 38 cars, including 2 accessible spaces;*
 - *Eight (8) data halls across four (4) storeys with an IT load of 76 MW and a maximum power consumption of 120 MW, plus rooftop plant;*
 - *Three (3) storey office/front of house building;*
 - *Five (5) storey enclosed generator gantry to rear of data centre.*
- *New Ausgrid 132 kilovolt (KV) Sub-Transmission Switching Station (STSS);*
- *A new pedestrian through-site link from Julius Avenue to Richardson Place;*
- *Complementary landscaping and offset planting;*
- *1,393m² of ancillary offices and associated amenities; and*
- *Hours of operation being on a 24 hours per day, 7 days per week basis.*

Consent is sought to develop the subject site for a data centre, in accordance with the following plans:



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Julius Avenue Data Centre
6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

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REGISTER OF PROJECT PLANS			
Drawing	Title	Rev.	Date
Architectural Plans (Appendix DD2)			
011003	SITE PLAN	4	25.11.25
011004	SITE EASEMENT PLAN	2	06.12.25
040001	GFA CALCULATION DIAGRAMS	1	09.12.25
060001	SHADOW DIAGRAMS - SUMMER SOLSTICE	1	09.12.25
060002	SHADOW DIAGRAMS - WINTER SOLSTICE	1	09.12.25
101001	GROUND FLOOR PLAN	2	25.11.25
101101	LEVEL 01 PLAN	2	25.11.25
101201	LEVEL 02 PLAN	2	25.11.25
101301	LEVEL 03 PLAN	2	25.11.25
101401	LEVEL 04 PLAN	1	25.11.25
101501	LEVEL 05 PLAN	1	25.11.25
101601	LEVEL 06 PLAN	2	25.11.25
150001	BUILDING ELEVATIONS 01	3	12.12.25
150002	BUILDING ELEVATIONS 02	2	12.12.25
200001	BUILDING SECTION - SHEET 01	1	25.11.25
200002	BUILDING SECTION - SHEET 02	1	25.11.25
250001	3D VIEWS - SHEET 01	3	12.12.25
Landscape Drawings (Appendix DD12)			
Civil Engineering Report (Appendix DD21)			



**APPENDIX B
AMENDED
STATUTORY
COMPLIANCE
TABLE**



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
Considerations under the EP&A Act and EP&A Regulation				
<i>Environmental Planning and Assessment Act 1979</i>	Section 1.3 – Objects of the Act	<i>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State’s natural and other resources,</i>	The Proposal is appropriately located in an existing employment area of strategic importance. The suitability of the Site and the Proposal would see social and economic benefits for the area, without impacts to the State’s natural and other resources.	-
		<i>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	The Proposal continues to facilitate ecologically sustainable development.	Refer to Section 6.2.6 of this Amendment Report.
		<i>(c) to promote the orderly and economic use and development of land,</i>	As well as fulfilling a significant role in satisfying market needs, the Proposal also demonstrates a logical redevelopment of an undeveloped Site. The Site’s economic development is both logical and orderly for the following reasons: <ul style="list-style-type: none"> ▪ It delivers employment-generating opportunities in both the construction and operational phases in an area already earmarked by both State and Regional policies for employment and advancement. ▪ It provides both a new economically and ecologically sustainable development, delivering new industry-best-practice in data centre construction. 	-



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
			<ul style="list-style-type: none"> ▪ It implements best-practice sustainability measures, to promote ecologically sustainable development. ▪ It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the site, further minimising the potential impacts of the Urban Heat Island Effect, by further reducing the Site's microclimate. ▪ It improves water-quality for stormwater in accordance with the requirements of Council's engineering guidelines. 	
		<i>(d) to promote the delivery and maintenance of affordable housing,</i>	Not applicable - this objective is not applicable to the proposed development, as the Proposal does not seek consent for housing.	-
		<i>(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i>	The Site's biodiversity has been suitably assessed, including impacts to threatened and other species of native animals and plants, ecological communities and their habitats.	Refer to Appendix DD15 .
		<i>(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i>	Both environmental and Aboriginal cultural heritage has been suitably assessed, finding that: <ul style="list-style-type: none"> ▪ the Proposal does not impact on any items of historical heritage; and ▪ the Site is considered to be of low archaeological potential to contain Aboriginal cultural heritage and there will 	Refer to Section 6.1.18 of the EIS and Appendix DD26 .



AMENDED STATUTORY COMPLIANCE TABLE

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
			be no harm to known heritage values by the proposed works.	
		<i>(g) to promote good design and amenity of the built environment,</i>	The vision of the Proposal is to create a high-quality built form with integrated landscaping. The Proposal is considered to promote both good design and improved amenity, through the use of new-age materials and innovative contemporary design.	Refer to Appendix DD3 .
		<i>(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i>	The Proposal would be implemented through best-industry practice standards and measures. The Proposal has been designed in accordance with the NCC. This incorporates into the design, all statutory and functional requirements, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.	-
		<i>(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i>	The Proposal is SSD, which devolves the environmental planning and assessment of the application to NSW DPHI. Notwithstanding, the Proposal has also been informed by engagement with Council.	-
		<i>(j) to provide increased opportunity for community participation in environmental planning and assessment.</i>	Community and stakeholder engagement has been undertaken for the DA. This has included meetings and notification letters to both agencies and all potentially impacted stakeholders.	Refer to Part 5 of this Amendment Report.



AMENDED STATUTORY COMPLIANCE TABLE

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
	Section 4.15(1)(a) – Matters for consideration—general	<i>(i) any relevant environmental planning instrument, and</i>	EPIs relevant to the Site and Proposal include: <ul style="list-style-type: none"> • Commonwealth Environment Protection and Biodiversity Conservation Act 1999 • Environmental Planning and Assessment Act 1979 • Environmental Planning and Assessment Regulation 2021 • National Parks and Wildlife Act 1974 • Biodiversity Conservation Act 2016 • Protection of the Environment Operations Act 1997 • State Environmental Planning Policy (Resilience and Hazards) 2021 • State Environmental Planning Policy (Transport and Infrastructure) 2021 • State Environmental Planning Policy (Biodiversity and Conservation) 2021 • State Environmental Planning Policy (Sustainable Buildings) 2022 • Ryde Local Environmental Plan 2014 • Macquarie Park Design Guide • Ryde Development Control Plan 2014 	Refer below.
		<i>(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent</i>	There are no draft instruments applicable to the Site.	Refer below.



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
		<i>authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and</i>		
		<i>(iii) any development control plan, and</i>	Despite the provisions of Clause 2.10 of <i>State Environmental Planning Policy (Planning Systems) 2021</i> , the provisions of RDCP 2014 have been considered where they are not inconsistent with the Macquarie Park Design Guide, which takes precedence.	Refer to relevant provisions throughout this EIS.
		<i>(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and</i>	The Proponent intends to enter into a Planning Agreement, which will be negotiated between the Proponent and the City of Ryde Council. A Draft Letter of Offer has been provided at Appendix DD31 to satisfy the requirements of Clause 7.7 of RLEP 2014.	Refer to Appendix DD31 of this Amendment Report.
		<i>(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),</i>	-	Refer below.
	Section 4.15(1)(b) – Matters for consideration—general	<i>the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</i>	The likely impacts of the Proposal are discussed throughout Part 6 of this Amendment Report and EIS.	Refer to Part 6 of this Amendment Report and EIS.
	Section 4.15(1)(c) – Matters for consideration—general	<i>the suitability of the site for the development,</i>	The suitability of the Site is discussed in Section 7.1.1 of this Amendment Report.	Refer to Section 7.1.1



AMENDED STATUTORY COMPLIANCE TABLE

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
	Section 4.15(1)(d) - Matters for consideration—general	<i>any submissions made in accordance with this Act or the regulations</i>	Part of the forthcoming exhibition and response to submissions phases.	N/A
	Section 4.15(1)(e) - Matters for consideration—general	<i>the public interest</i>	<p>The Proposal is in the public interest as it:</p> <ul style="list-style-type: none"> ▪ Provides a significant employment-generating use within an established employment generating precinct and provides an important part of cloud infrastructure. ▪ Provides additional trees to support local and regional targets to increase tree canopy coverage. ▪ Is consistent with the ESD principles as defined by Section 190 of the EP&A Regulations. ▪ Has undertaken an extensive program of engagement with relevant stakeholders predates the submission of this SSDA, as detailed at length within Appendix DD. ▪ Provides significant investment in the industrial sector within the Ryde LGA that will contribute to increased livelihood outcomes associated with the construction and operation phases. This has the potential to positively support livelihoods, not just directly through job creation but also by 	Refer to Part 7 of this Amendment Report.



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
			<p>extending to local businesses and the overall improvement of the precinct.</p> <ul style="list-style-type: none"> ▪ Provides public benefit infrastructure in accordance with the Macquarie Park Design Guide that improves connectivity and recreation for the public. 	
<i>Environmental Planning and Assessment Regulation 2021</i>	Section 190 – Form of environmental impact statement	<p>(1) <i>An environmental impact statement must contain the following information—</i></p> <p>(a) <i>the name, address and professional qualifications of the person who prepared the statement,</i></p> <p>(b) <i>the name and address of the responsible person,</i></p> <p>(c) <i>the address of the land—</i></p> <p style="padding-left: 20px;"><i>(i) to which the development application relates, or</i></p> <p style="padding-left: 20px;"><i>(ii) on which the activity or infrastructure to which the statement relates will be carried out,</i></p> <p>(d) <i>a description of the development, activity or infrastructure,</i></p> <p>(e) <i>an assessment by the person who prepared the statement of the environmental impact of the development, activity or infrastructure, dealing with the matters referred to in this Division.</i></p>	The EIS has been prepared in accordance with the information required by Section 190(1).	Refer to entire EIS in conjunction with this Amendment Report.



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		<p><i>(2) The person preparing the statement must have regard to—</i></p> <p><i>(a) for State significant development—the State Significant Development Guidelines, or</i></p> <p><i>(b) for State significant infrastructure—the State Significant Infrastructure Guidelines.</i></p>	<p>The EIS previously submitted has been prepared in accordance with the State Significant Development Guidelines.</p>	<p>Refer to entire EIS in conjunction with this Amendment Report.</p>
		<p><i>(3) An environmental impact statement must also contain a declaration by a relevant person that—</i></p> <p><i>(a) the statement has been prepared in accordance with this Regulation, and</i></p> <p><i>(b) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure, and</i></p> <p><i>(c) the information contained in the statement is not false or misleading, and</i></p> <p><i>(d) for State significant development or State significant infrastructure—the statement contains the information required under the Registered Environmental Assessment Practitioner Guidelines.</i></p>	<p>The EIS previously submitted has been prepared in accordance with Section 190(3).</p>	<p>Refer to entire EIS in conjunction with this Amendment Report.</p>



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	Section 191 – Compliance with environmental assessment requirements	<i>The environmental impact statement must comply with the environmental assessment requirements notified under section 176 or the Act, section 5.16(4).</i>	<p>The SEARs (reference SSD-80018208) were issued by the NSW DPHI on 20 February 2025 and identified the following key Issues to be addressed as part of this EIS, including:</p> <ol style="list-style-type: none"> 1. Statutory Context 2. Estimated Development Cost and Employment 3. Design Quality 4. Built Form and Urban Design 5. Visual Impact 6. Traffic, Transport and Accessibility 7. Trees and Landscaping 8. Ecologically Sustainable Development 9. Biodiversity 10. Back-up Power System 11. Air Quality 12. Noise and Vibration 13. Ground and Water Conditions 14. Water Management 15. Flooding Risk 16. Hazards and Risks 17. Contamination and Remediation 18. Waste Management 19. Aboriginal Cultural Heritage 20. Environmental Heritage 21. Social Impact 22. Infrastructure Requirements and Utilities 	Refer to Part 6 of this Amendment Report.



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			23. Bush Fire Risk 24. Construction, Operation and Staging 25. Contributions and Public Benefit 26. Engagement Additional assessment matters were also identified in the SEARs Cover Letter provided.	
	<i>Section 35 - Additional requirements for development applications in certain areas of Sydney</i>	Section 35(2) of the Regulation prescribes the following <i>(2) a person must not apply to a consent authority for development consent to carry out development on the following land unless the application is accompanied by an assessment of the consistency of the development with the relevant plan—</i> <i>(h) land identified as “Macquarie Park Corridor” on the Macquarie Park Corridor Map under Ryde Local Environmental Plan 2014, other than land identified as “Macquarie Park Precinct”,</i> relevant plan for subclause h) means the Macquarie Park Innovation Precinct Place Strategy	The Site is located on land identified as “Macquarie Park Precinct” and therefore a statement of consistency with the Macquarie Park Innovation Precinct Place Strategy is not required.	N/A
	<i>Section 35BA - Embodied emissions for non-residential development under</i>	Clause 35A prescribes the following: <i>(1) A development application for non-residential development under State Environmental Planning Policy (Sustainable Buildings) 2022 must—</i>	An amended NABERS Embodied Emissions Materials Form has been provided to address the requirements of this clause.	Refer to Appendix DD14 .



AMENDED STATUTORY COMPLIANCE TABLE

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	<i>Sustainable Buildings SEPP</i>	<p>(a) <i>disclose the amount of embodied emissions attributable to the development, and</i></p> <p>(b) <i>describe the use of low emissions construction technologies in the development.</i></p>		
	<i>Section 35C - Net zero statement for non-residential development under Sustainable Buildings SEPP</i>	<p>Clause 35C prescribes the following:</p> <p>(2) <i>The development application must include evidence that the development—</i></p> <p>(a) <i>will not use on-site fossil fuels after the occupation and use of the development commence, or</i></p> <p>(b) <i>incorporates the infrastructure, or space for the infrastructure, necessary for the development to not use on-site fossil fuels after 1 January 2035.</i></p> <p><i>Note— Infrastructure includes plant, equipment and ventilation.</i></p> <p>(3) <i>The development application must include details of the following—</i></p> <p>(a) <i>any renewable energy generation and storage infrastructure forming part of the development,</i></p> <p>(b) <i>passive and technical design features that minimise energy consumption by users of the development.</i></p> <p>(4) <i>The development application must include the following information if available—</i></p>	<p>The Proposal has an office GLA of less than 1,000m² and is therefore not considered a prescribed office premises. Therefore, a Net Zero Statement is not required.</p>	N/A



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		<p>(a) <i>the estimated annual energy consumption for the building in kilowatt hours per square metre of floor area,</i></p> <p>(b) <i>the estimated amount of emissions relating to energy use in the building, including direct and indirect emissions.</i></p>		
	Section 192 – Content of environmental impact statement	<p>Section 192(f) prescribes that <i>an environmental impact statement must contain the following–</i></p> <p>(f) <i>the reasons justifying the carrying out of the development, activity or infrastructure, considering biophysical, economic and social factors, including the principles of ecologically sustainable development set out in section 193.</i></p>	An Ecologically Sustainable Development Report has been provided that addresses the principles of ESD as set out in Section 193 of the Regulation.	Refer to Appendix DD13.
Considerations under EPIs				
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	<u>Chapter 2– Protecting the environment</u>	<p>Clause 18 - Actions with significant impact on listed threatened species or endangered community prohibited without approval</p> <p>(1) A person must not take an action that:</p> <p>(a) <i>has or will have a significant impact on a listed threatened species included in the extinct in the wild category; or</i></p> <p>(b) <i>is likely to have a significant impact on a listed threatened species included in the extinct in the wild category.</i></p>	<p>A BDAR has been provided to address the requirements of this clause.</p> <p>The BDAR has not identified any MNES as having the potential to occur within the Site.</p>	Refer to Appendix DD15.



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<i>Biodiversity Conservation Act 2016</i>	Part 7, Division 2, Clause 7.9 Biodiversity assessment for State significant development or infrastructure	Clause 7.9- Biodiversity assessment for State significant development or infrastructure <i>(1) This section applies to— (a) an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development... (2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. (3) The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.</i>	A BDAR has been prepared for the Proposal in accordance with the requirements of this clause and this EIS has considered the environmental assessment contained within the BDAR.	Refer to Appendix DD15 .
<i>Protection of the Environment Operations Act 1997</i>	<u>Chapter 3 - Environmental protection licences</u>	Schedule 1, Clause 9(1) - Petroleum products storage Pursuant to Clause 9 of Schedule 1 of the Act, 'petroleum products storage', which would include diesel fuel storage, is a Scheduled Activity.	The Proposal provides storage for 955kL which does not exceed the 2000t threshold as discussed in the Preliminary Risk Screening provided at Appendix DD23 . Therefore, an EPL is not required.	Refer to Appendix DD23 .



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		<p><i>The relevant threshold prescribed by Clause 9 of Schedule 1 for chemical storage is 2,000t.</i></p>		
		<p>Schedule 1, Clause 17 – Electricity Generation</p> <p><i>Pursuant to Clause 17 of Schedule 1 of the Act, 'electricity generating works, which would include the capacity to generate more than 30 megawatts of electrical power is a Scheduled Activity.</i></p> <p><i>However, this clause does not apply to the generation of electricity by means of electricity plant that is emergency stand-by plant operating for less than 200 hours per year.</i></p>	<p>Details of all emergency back-up generators has been provided at to confirm that the electricity generation will not require an EPL.</p>	<p>Refer to Appendix DD16.</p>
<p>State Environmental Planning Policy (Biodiversity and Conservation) 2021</p>	<p><u>Chapter 2: Vegetation in Non-Rural Areas</u></p>	<p>Part 2.2 Clearing vegetation in non-rural areas</p> <p><i>Pursuant to Part 2.2 of the SEPP, a person must not clear vegetation in a non-rural area of the State without the authority conferred by a permit granted by the council under that Part.</i></p>	<p>An Arboricultural Impact Assessment has been prepared for the Site which addresses the matter of tree removal on the Site.</p>	<p>Refer to Appendix DD12.</p>
<p>State Environmental Planning Policy (Resilience and Hazards) 2021</p>	<p><u>Chapter 3 – Hazardous of offensive development</u></p>	<p>Clause 3.11 - Preparation of preliminary hazard analysis</p> <p><i>Pursuant to Clause 3.11 of the SEPP, a person who proposes to make a development application to carry out development for the purposes of a potentially hazardous industry must prepare (or cause to be prepared) a preliminary hazard analysis in accordance with the current circulars or guidelines published by</i></p>	<p>A Preliminary Risk Screening has been provided at Appendix DD23 in accordance with <i>Applying SEPP 33</i> which reconfirms that the Proposal is not potentially hazardous or potentially offensive industry.</p>	<p>Refer to Appendix DD23.</p>



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
		<i>the DPE and submit the analysis with the development application.</i>		
	<u>Chapter 4 - Remediation of Land</u>	<p>Clause 4.6 - Contamination and remediation to be considered in determining development application</p> <p>Pursuant to Clause 4.6 of the SEPP, the consent authority must not grant consent unless:</p> <p>(a) it has considered whether the land is contaminated, and</p> <p>(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and</p> <p>(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.</p>	A Detailed Site Investigation been carried out for the Site which has determined that the Site is suitable for the Proposal in its current state.	Refer to Appendix DD24.
State Environmental Planning Policy (Transport and Infrastructure) 2021	<u>Chapter 2 - Infrastructure</u>	<p>Clause 2.122 - Traffic-generating development</p> <p>Pursuant to Clause 2.122 and Schedule 3 of the SEPP, the Proposal is for industries and the relevant size or capacity is less than 20,000m².</p>	<p>It is noted that the Proposal meets the relevant threshold for traffic-generating development.</p> <p>A Transport and Accessibility Impact Assessment has been prepared in support of the Proposal which addresses the accessibility of the</p>	Refer to Appendix DD8.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
			<p>Site and potential traffic safety, road congestion or parking implications of the development.</p> <p>It is noted that the consent authority must provide written notice of the application to TfNSW.</p>	
<p>State Environmental Planning Policy (Sustainable Buildings) 2022</p>	<p><u>Chapter 3 - Standards for non-residential development</u></p>	<p>Clause 3.2 Development consent for non-residential development:</p> <p>Pursuant to Chapter 3, Clause 3.2 of the Sustainable Buildings SEPP:</p> <p>(1) <i>In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—</i></p> <p>(a) <i>the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,</i></p> <p>(b) <i>a reduction in peak demand for electricity, including through the use of energy efficient technology,</i></p> <p>(c) <i>a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,</i></p> <p>(d) <i>the generation and storage of renewable energy,</i></p>	<p>The ESD Report provided details that the Proposal seeks to minimise greenhouse gas emissions and consumption of energy, water (including water sensitive urban design) and material resources.</p> <p>A NABERS Embodied Emissions Materials Form has been completed for the Proposal which quantifies the embodied emissions attributable to the development.</p>	<p>Refer to Appendix DD13 and Appendix DD14 respectively.</p>



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		<p>(e) the metering and monitoring of energy consumption,</p> <p>(f) the minimisation of the consumption of potable water.</p> <p>(2) Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</p>		
Ryde Local Environmental Plan 2014	<u>Clause 2.3 - Zone objectives and Land Use Table</u>	<p>Pursuant to Clause 2.3(2) of the LEP, the consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.</p> <p>The objectives of the E3 zone are as follows:</p> <ul style="list-style-type: none"> • To provide a range of facilities and services, light industries, warehouses and offices. • To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres. • To maintain the economic viability of local and commercial centres by limiting certain retail and commercial activity. • To provide for land uses that meet the needs of the community, businesses and industries 	<p>The Proposal is considered to be consistent with the objectives of the zone in the following manner:</p> <ul style="list-style-type: none"> ▪ The Proposal is for a data centre which is defined as a high technology industry, which is a sub definition of light industry. The Proposal is adjacent a range of office, commercial and light industrial uses and increases the range of development in the locality. ▪ Data centres are permitted with consent in the E3 Productivity Support zone and therefore considered compatible with the surrounding development. The Proposal supports data intensive uses and does not compete with adjoining development. ▪ The Proposal will encourage employment and does not interfere with the viability of the Macquarie Park 	-



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		<p>but that are not suited to locations in other employment zones.</p> <ul style="list-style-type: none"> To provide opportunities for new and emerging light industries. To enable other land uses that provide facilities and services to meet the day to day needs of workers, to sell goods of a large size, weight or quantity or to sell goods manufactured on-site. To promote sustainable development, including public transport and working environments. To encourage industries involved in research and development. 	<p>Accelerated TOD Precinct by limiting retail or commercial activity.</p> <ul style="list-style-type: none"> The need for data centres is continuously growing due to rapid technological advancements in the e-commerce sector. As such, the Proposal is considered to meet the needs of businesses and industries associated with the E3 Productivity Support zone. Data centres are defined as high technology industry, which is a sub definition of light industry. The Proposal promotes sustainable development through the retention of existing vegetation, upgrades to existing pathways, the provision of recreational walkways to bushland, and being located within 600m of the North Ryde Metro Station. Data centres are defined as high technology industry, which are driven by technological advancements in the e-commerce sector. As such, the Proposal is consistent with this objective. 	
	<u>Clause 4.3 - Maximum Height of Building</u>	Pursuant to Clause 4.3(2) of the LEP, the maximum height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.	The Proposal has a maximum building height of 40m and therefore complies with the development standard. The Clause 4.6 Variation Request previously submitted is no longer required in regard to height of building..	-



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		<p>The Site is subject to a maximum building height development standard of 30m.</p> <p>Refer to Clause 7.7 of RLEP 2014 for the relevant incentive building height development standard.</p>	Refer to Clause 7.7 of RLEP 2014 for the relevant incentive building height development standard.	
	<u>Clause 4.4 - Floor Space Ratio</u>	<p>Pursuant to Clause 4.4(2) of the LEP, the maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.</p> <p>The Site is subject to a maximum FSR development standard of 1:1, measured in accordance with Clause 4.5 of the LEP below.</p>	The Proposal has an FSR of 0.58:1 and therefore complies with the maximum FSR development standard, measured in accordance with Clause 4.5 of the LEP below.	Refer to Appendix DD2 .
	<u>Clause 4.5 - Calculation of floor space ratio and site area</u>	The calculation of floor space ratio and site area must be calculated in accordance with Clause 4.5 of the LEP.	The calculation of floor space ratio and site area has been measured across the Site in accordance with Clause 4.5 of the LEP.	Refer to Appendix DD2 .
	<u>Clause 4.6 - Exceptions to development standards</u>	<p>Pursuant to Clause 4.6(3) of the LEP, <i>development consent must not be granted to development that contravenes a development standard unless the consent authority is satisfied the applicant has demonstrated that—</i></p> <p><i>(a) compliance with the development standard is unreasonable or unnecessary in the circumstances, and</i></p> <p><i>(b) there are sufficient environmental planning grounds to justify the</i></p>	No exceptions to development are sought through the amended development.	-



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		<i>contravention of the development standard.</i>		
	<u>Clause 5.21 - Flood Planning</u>	<p>Pursuant to Clause 5.21 of the LEP, <i>development consent must not be granted unless the consent authority is satisfied the development</i></p> <p><i>(a) is compatible with the flood function and behaviour on the land, and</i></p> <p><i>(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and</i></p> <p><i>(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i></p> <p><i>(d) incorporates appropriate measures to manage risk to life in the event of a flood, and</i></p> <p><i>(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.</i></p>	<p>An amended Flood Impact and Risk Assessment has been provided that has considered the compatibility of the Proposal with the flood function and behaviour on the land.</p> <p>The Flood Impact and Risk Assessment concludes the Proposal is demonstrated to have no adverse flood impacts on adjacent or downstream properties and the Site can be developed and operated safely, with appropriate design measures to manage residual flood risk, as discussed in Section 6.2.12.</p> <p>Considering this, the Proposal is considered to be consistent with Clause 5.21 of RLEP 2014.</p>	Refer to Appendix DD22
	<u>Clause 6.1 - Acid sulfate soils</u>	Pursuant to Clause 6.1 of the LEP, <i>development consent must not be granted for the carrying out of works unless an acid sulfate soils</i>	The Site is identified on the Acid Sulfate Soils Map as Class 5. A Geotechnical Investigation is provided at Appendix DD19 which identified	Refer to Appendix DD19 .



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		<i>management plan has been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.</i>	that the Site is unlikely to be affected by acid sulfate soils and the preparation of an Acid Sulfate Soils Management Plan is not warranted.	
	<u>Clause 6.2 - Earthworks</u>	<p>Pursuant to Clause 6.2 of the LEP, <i>in deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters—</i></p> <p><i>(a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,</i></p> <p><i>(b) the effect of the development on the likely future use or redevelopment of the land,</i></p> <p><i>(c) the quality of the fill or the soil to be excavated, or both,</i></p> <p><i>(d) the effect of the development on the existing and likely amenity of adjoining properties,</i></p> <p><i>(e) the source of any fill material and the destination of any excavated material,</i></p> <p><i>(f) the likelihood of disturbing relics,</i></p> <p><i>(g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,</i></p>	<p>A Geotechnical Assessment is provided at Appendix DD19 which addresses the requirements of this clause.</p> <p>The Proposal is considered to be consistent with Clause 6.2 of RLEP 2014 in the following manner:</p> <ul style="list-style-type: none"> • The Proposal will not result in the disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, • The Proposal will not have any negative impact on the likely future use or redevelopment of the land, • The quality of any excavated fill or soil, and the source of any fill material and the destination of any excavated material has been considered as part of the contamination investigations carried out for the Proposal. • The likelihood of disturbing relics has been considered low and is subject to recommended mitigation measures; and • Any appropriate measures to avoid, minimise or mitigate the impacts of the 	Refer to Appendix DD19 .



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		<i>(h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i>	development and been identified in Appendix D of this EIS.	
	<u>Clause 6.4 - Stormwater management</u>	<p>Clause 6.3 - Stormwater Management</p> <p><i>Pursuant to Clause 6.4(3) of the LEP, development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development—</i></p> <ul style="list-style-type: none"> <i>i. is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and</i> <i>i. includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and</i> <i>i. avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact.</i> 	A Water Management Plan is provided at Appendix DD21 which addresses the requirements of this clause.	Refer to Appendix DD21 .
	<u>Clause 6.6 - Environmental sustainability</u>	<p>Clause 6.6 Environmental sustainability</p> <p><i>Pursuant to Clause 6.6(2) of the LEP, development consent must not be granted to development on land in an employment zone if the development is 1,500 square metres in gross floor area or greater unless the consent</i></p>	An ESD Report is provided at Appendix DD13 which addresses the requirements of this Clause.	Refer to Appendix DD13 .



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
		<p><i>authority is satisfied that the development has regard to the following—</i></p> <p><i>(a) water demand reduction, including water efficiency, water recycling and minimisation of potable water usage,</i></p> <p><i>(b) energy demand reduction, including energy generation, use of renewable energy and reduced reliance on mains power,</i></p> <p><i>(c) indoor environmental quality, including daylight provision, glare control, increased outside air rates, thermal comfort,</i></p> <p><i>(d) a reduction in new materials consumption and use of sustainable materials, including recycled content in concrete, sustainable timber and PVC minimisation,</i></p> <p><i>(e) emissions reduction, including reduced flow to sewer and light pollution,</i></p> <p><i>(f) transport initiatives to reduce car dependence such as providing cycle facilities, car share and small vehicle parking spaces,</i></p> <p><i>(g) land use and ecology, including reduced topsoil removal and contaminated land reclamation.</i></p>		



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
	<u>Clause 6.7 - Ground floor development on land in Zone E3</u>	Pursuant to Clause 6.7 of the LEP, 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.	The entire ground floor of the Proposal is being used as a light industry, which is consistent with the requirements of the clause. Therefore, no further consideration of this clause is warranted.	N/A
	<u>Clause 7.3 - Design guide</u>	Pursuant to Clause 7.3 of the LEP, 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.	An amended compliance table reflecting the Proposal's consistency with the Macquarie Park Design Guide is provided at Appendix DD33 which addresses the requirements of this clause.	Refer to Appendix DD33 .
	<u>Clause 7.4 - Effect on neighbouring sites</u>	Pursuant to Clause 7.4 of the LEP, development consent must not be granted to development on land to which this part applies unless the consent authority is satisfied the development will not result in a neighbouring site becoming— (a) a site for which consolidation with an adjoining site is not— (i) physically possible, or (ii) reasonably feasible because of the nature of surrounding development, or (b) a site that has a reduced development potential because of its size, shape or location.	The Macquarie Park Design Guide does not include any provisions relating to lot consolidation. Notwithstanding, the development will not result in any neighbouring site becoming <ul style="list-style-type: none"> ▪ a site for which consolidation with an adjoining site is not physically possible, or reasonably feasible because of the nature of surrounding development, or ▪ a site that has a reduced development potential because of its size, shape or location. Therefore, no further consideration of this clause is warranted.	-



AMENDED STATUTORY COMPLIANCE TABLE

Julius Avenue Data Centre

6-8 Julius Avenue, North Ryde (Lot 89 DP1082131) - SSD-80018208

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS/Amendment Report
	<u>Clause 7.7 - Additional requirements for increased building height and floor space ratios on land other than Key Sites</u>	<p>Pursuant to Clause 7.7(3) of the LEP, <i>the consent authority may approve development with a height and FSR that does not exceed the increased building height and floor space ratio identified on the Macquarie Park Corridor Precinct Incentive Height of Buildings Map and the Macquarie Park Corridor Precinct Incentive Floor Space Ratio Map, but only if the consent authority is satisfied that the development includes adequate provision for one or both of the following—</i></p> <p>(a) <i>recreation areas that are configured and located in a way that is appropriate for the recreational purposes of the Precinct,</i></p> <p>(b) <i>an access network that is configured and located in a way that will allow a suitable level of connectivity within the Precinct.</i></p>	<p>The Proposal seeks to utilise the incentive building height development standard and provides adequate provision for recreation areas and an access network that is consistent with the provisions of the Macquarie Park Design Guide.</p> <p>A Draft Letter of Offer has been prepared and is provided at Appendix DD31 in the context of the proposed Planning Agreement with Council.</p>	Refer to Appendix DD31 .



**APPENDIX C
AMENDED
MITIGATION
MEASURES
TABLE**



MITIGATION MEASURES TABLE

Julius Avenue Data Centre
6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

Project:	State Significant Development Application (SSD-80018208) For: Julius Avenue Data Centre
Applicant:	ISPT Pty Ltd
Site:	6-8 Julius Avenue, North Ryde Lot 89 DP1082131

ISPT Pty Ltd plan to undertake the construction and operation of the data centre, in accordance with the following planned management and mitigation measures. Amendments are shown in **red**.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-80018208		
ID	Management / Mitigation Measure	Timing
Administrative Commitments		
A1	<p>Commitment to Minimise Harm to the Environment</p> <p>The Proponent will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development</p>	Prior to construction, during construction, and during operation.
A2	<p>Terms of Approval</p> <p>The Proponent will carry out the project generally in accordance with the:</p> <ul style="list-style-type: none"> (a) Environmental Impact Statement; (b) Amendment Report (c) Drawings; (d) Management and Mitigation Measures; (e) Any Conditions of Approval. <p>If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.</p>	Prior to construction, during construction, and during operation.
A3	<p>Occupation Certificate</p> <p>The Proponent will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.</p>	Prior to operation.
A4	<p>Compliance</p> <p>The Proponent will ensure compliance with any reasonable requirement(s) of the Secretary of the NSW DPHI arising from the assessment of:</p> <ul style="list-style-type: none"> (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval. 	Prior to construction, during construction, and during operation.
A5	<p>Structural Adequacy</p> <p>The Proponent will ensure that all new buildings and structures on the Site are constructed in accordance with the relevant requirements of the National Construction Code.</p>	During construction.
A6	<p>Construction Environmental Management Plan</p> <p>Prior to the commencement of construction, the Proponent would prepare a Construction Environmental Management Plan (CEMP) that addresses the following:</p>	Prior to construction.



MITIGATION MEASURES TABLE

 Julius Avenue Data Centre
 6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-80018208		
ID	Management / Mitigation Measure	Timing
	(a) Air Quality; (b) Noise and Vibration; (c) Waste Classification; (d) Erosion and Sediment Control; (e) Materials Management Plan; and (f) Community Consultation and Complaints Handling.	
A7	Site Induction All staff employed on the site by the construction contractor will be required to undergo a site induction.	Prior to construction.
A8	Operation of Plant and Equipment The Proponent will ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.	During operation.
A9	Monitoring the State of Roadways The Proponent will monitor the state of roadways leading to and from the Site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed by the Lane Cove Council.	During construction.
A10	Waste Receipts The Proponent will ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the Site, be kept and maintained up to date at all times. Such records will be made available to authorised person upon request.	During construction and operation.
A11	Complaints Handling The Proponent will prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.	Prior to operation.
A12	Soil and Water Management A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP), or equivalent, will be implemented for the construction of the proposed development.	Prior to and during construction.
Specific Environmental Commitments		
Air Quality		
AQ1	Air quality mitigation and monitoring will form part of the CEMP, to be prepared for the project, as outlined in A6 .	Prior to construction.
AQ2	The Proponent shall ensure that site-specific management and mitigation measures outlined in Table B10 of Appendix B of the amended AQIA are implemented.	Prior to construction and at all stages of the project.
Biodiversity		
BIO1	The Proponent will implement all mitigation measures outlined in the amended Biodiversity Development Assessment Report prepared by SLR Consulting.	Prior to and during construction.
Traffic and Transport		
TT1	The Proponent will finalise and implement the Construction Traffic Management Plan (CTMP).	Prior to and during construction.



MITIGATION MEASURES TABLE

 Julius Avenue Data Centre
 6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-80018208		
ID	Management / Mitigation Measure	Timing
Cultural Heritage		
H1	An Unexpected Finds Policy will be developed, in the unlikely event that relics are identified during ground disturbing works.	Prior to construction.
H2	Unexpected Aboriginal objects remain protected by the <i>National Parks and Wildlife Act 1974</i> . If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity will cease immediately. A qualified archaeologist would be contacted to assess the find and Heritage NSW and Metropolitan Local Aboriginal Land Council would be notified.	During construction.
H3	If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity will cease, the site would be secured, and the NSW Police and Heritage NSW would be notified	During construction.
H4	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the NSW <i>Heritage Act 1977</i> and best practice as outlined in <i>The Burra Charter 2013</i> , during site inductions.	Prior to construction.
H5	The Proponent will provide a copy of the ACHA to the RAPs and consider all comments received. Delorean will continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.	Prior to construction
Socio-Economic		
SE1	The Proponent will notify surrounding businesses and residents one (1) week before commencement of construction activities. Notices should include: <ul style="list-style-type: none"> ▪ Details of the proposal, including contact details of management team ▪ Hours and expected period of construction ▪ Details regarding process should businesses or residents have concerns, questions or complaints 	Prior to construction.
SE2	The Proponent will set up a feedback process to manage and respond to stakeholder concerns, questions, or complaints. The Proponent will ensure that this process is clear and accessible to stakeholders such as surrounding businesses and residents.	Prior to and during construction.
SE3	The Proponent will implement the six (6) recommendations of the amended Social Impact Assessment prepared by Willowtree Communications.	All stages of the project.
Arboricultural		
ARB1	The following conditions are required before any work proceeds on site: <ul style="list-style-type: none"> • Site induction: All workers related to the construction process and before entering the site must be briefed about the requirements/conditions outlined in this report relative to the zone of protection, measures, and specifications 	Prior to construction.



MITIGATION MEASURES TABLE

 Julius Avenue Data Centre
 6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-80018208		
ID	Management / Mitigation Measure	Timing
	before the initiation of work. This is required as part of the site induction process. <ul style="list-style-type: none"> Project Arborist; A project arborist who conforms to the requirements of the AS 4970 is required to be nominated immediately after a Notice of Determination is issued, and they are to be provided with all related site documents. 	
ARB2	The Proponent will implement all recommendations of the amended Arboricultural Impact Assessment prepared by Tree IQ and dated 21 May 15 December 2025 in relation to tree protection measures.	Prior to and during construction.
Noise and Vibration		
NVI	The Proponent will implement noise mitigation measures in line with the amended Noise and Vibration Impact Assessment recommendations.	Prior to and during construction.
Flooding		
FL1	The Proponent will develop a Flood Emergency Response Plan (FERP) for the Proposal to address Site-specific flood safety and operational procedures.	Prior to operation.
Waste Management		
WM1	The Proponent will implement a project-specific Sustainable Procurement Policy prior to construction works commencing.	Prior to construction.
WM2	Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, would be conducted. Only wastes that cannot be cost effectively reused or recycled will be sent to landfill or appropriate disposal facilities.	During construction.
WM3	Waste materials produced from site preparation and construction activities will be separated at the source and stored separately on-site.	During construction.
WM4	The Site Manager or equivalent role will: <ul style="list-style-type: none"> Arrange for suitable waste collection contractors to remove any construction waste from site Ensure waste bins are not filled beyond recommended filling levels Ensure that all bins and loads of waste materials leaving site are covered Maintain waste disposal documentation detailing, at a minimum: <ul style="list-style-type: none"> Descriptions and estimated amounts of all waste materials removed from site Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables Records of waste and recycling collection vehicle movements, for example, date and time of loads 	During construction.



MITIGATION MEASURES TABLE

Julius Avenue Data Centre
 6-8 Julius Avenue, North Ryde (Lot 89 DP1082131)

SSD-80018208

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-80018208		
ID	Management / Mitigation Measure	Timing
	<ul style="list-style-type: none"> ○ removed, licence plate of collection vehicles, tip docket from receiving facility, and ○ Waste classification documentation for materials disposed to off-site recycling or landfill facilities. ▪ Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Council, SafeWork NSW or NSW EPA, and ▪ Remove waste during hours approved by Council. 	
WM5	<p>Site inductions, as required under A7 will ensure the following training is covered:</p> <ul style="list-style-type: none"> ▪ Legal obligations and targets ▪ Emergency response procedures on-site ▪ Waste priorities and opportunities for reduction, reuse, and recycling ▪ Waste storage locations and separation of waste ▪ Procedures for suspected contaminated and hazardous wastes ▪ Waste related signage ▪ The implications of poor waste management practices, and ▪ Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities. 	Prior to construction.



APPENDIX D SUPPORTING DOCUMENTS

Appendix DD1	Estimated Development Cost Report
Appendix DD2	Architectural Drawings
Appendix DD3	Architectural Design Report
Appendix DD4	Survey Plan
Appendix DD5	National Construction Code Compliance Report
Appendix DD6	Accessibility Report
Appendix DD7	Visual Impact Assessment & Report
Appendix DD8	Transport Impact & Accessibility Impact Report
Appendix DD9	Construction Traffic Management Plan
Appendix DD10	Green Travel Plan
Appendix DD11	Landscape Plan
Appendix DD12	Landscape Report
Appendix DD13	Ecologically Sustainable Development Report
Appendix DD14	NABERS Embodied Emissions Form
Appendix DD15	Biodiversity Development Assessment Report
Appendix DD16	Backup Power Summary
Appendix DD17	Air Quality Impact Assessment
Appendix DD18	Noise & Vibration Impact Assessment
Appendix DD19	Geotechnical Assessment
Appendix DD20	Surface & Groundwater Impact Assessment
Appendix DD21	Water Management Plan
Appendix DD22	Flood Impact Risk Assessment
Appendix DD23	Hazard & Risk Report
Appendix DD24	Preliminary Site Investigation
Appendix DD25	Waste Management Plan
Appendix DD26	Aboriginal Cultural Heritage Assessment Report
Appendix DD27	Statement of Heritage Impact
Appendix DD28	Social Impact Assessment
Appendix DD29	Infrastructure Delivery, Management & Staging Plan
Appendix DD30	Bushfire Assessment
Appendix DD31	Voluntary Planning Agreement
Appendix DD32	Engagement Report
Appendix DD33	Macquarie Park Design Guide Compliance
Appendix DD34	Preliminary Fire Safety Strategy
Appendix DD35	Wind Study

