



2 December 2025

REF: WTJ24 -549

Joanna Bakopanos
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

**RE: AMENDMENT TO SSD-80018208 – PROPOSED DATA CENTRE
PROPERTY AT 6-8 JULIUS AVENUE, NORTH RYDE (LOT 89 DP1082131)**

Dear Joanna,

INTRODUCTION

Reference is made in relation to SSD-80018208 for the construction and operation of a data centre at 6-8 Julius Avenue, North Ryde (the Subject Site). This letter has been prepared on behalf of ISPT Pty Ltd (now known as IFM Real Estate Fiduciary Pty Ltd) to request formal amendment to the subject State Significant Development (SSD) pursuant to Clause 37 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).

As a result of discussions with DPHI on 20 November 2025, the amendments to the proposed development are sought to ensure all concerns raised are adequately addressed and provide for the orderly and economic development of the proposed data centre.

The proposed amendments to SSD-80018208 are set out in the ensuing sections of this letter, including a detailed description of the proposed development as modified. A thorough assessment of the proposed changes will be formally submitted to DPHI once the scope of amendments is confirmed as acceptable, including required updated plans and technical reports.

The amendments sought to SSD-80018208 are set out below:

SUMMARY OF PROPOSED CHANGES

1. CHANGES TO OPERATIONAL MEASURES

The development now has a reduced facility capacity (approximately 76MW, from 115.2MW) thus reducing consumption demands. Further, an amendment to the cooling methods of the facility has been proposed, with an adoption of air-cooled chillers, rather than the water-cooled chillers previously included. **TABLE 1** below summates the changes to operational measures of the proposed development.

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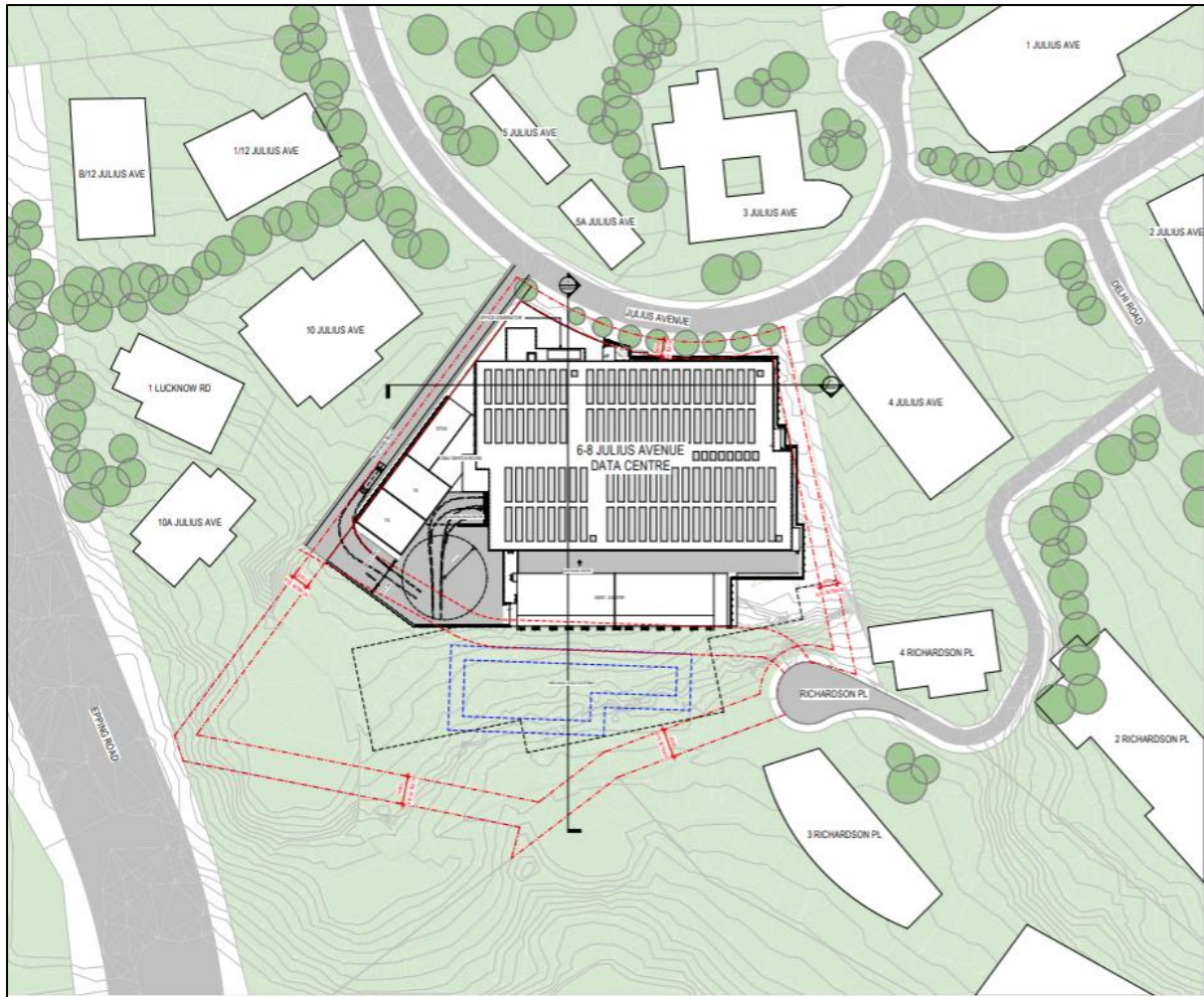


Figure 1. Amended Site Plan (Source: Greenbox Architects, 2025)

TABLE 1. PROPOSED CHANGES		
Item	Previously Proposed	Proposed Through Amendment
Capacity	115.2MW	76MW, a reduction of approximately 34%.
Cooling Method	Water-cooled chiller level with rooftop cooling towers.	Single rooftop level comprising of air-cooled chillers.
Number of Storeys	6 storeys	4 storeys
Gross Floor Area (GFA)	26,076m ²	16,647m ²
Car parking	Basement level	Ground level

1.1. Justification

The reduction in capacity has been catalysed by the responses received during the submission period. 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).

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).

Basement car parking has been relocated to the ground level adjacent to the proposed loading dock. As the site is zoned E3 under the RLEP 2014, Clause 6.7 applies, restricting ground floor development to commercial activities, and parking would be inconsistent with this requirement. The City of Ryde highlighted this technicality and provided advice that the parking is at ground level but not perceivable from street level due to the site's topography, and is therefore considered acceptable. The site has undergone major earthworks, with the actual ground floor situated more than 12 metres below Julius Avenue and aligning with the existing cut level.

City of Ryde has confirmed the approach of using the ground floor for parking is generally suitable. This amendment also seeks endorsement from DPFI for a future Clause 4.6 Variation Request on this basis.

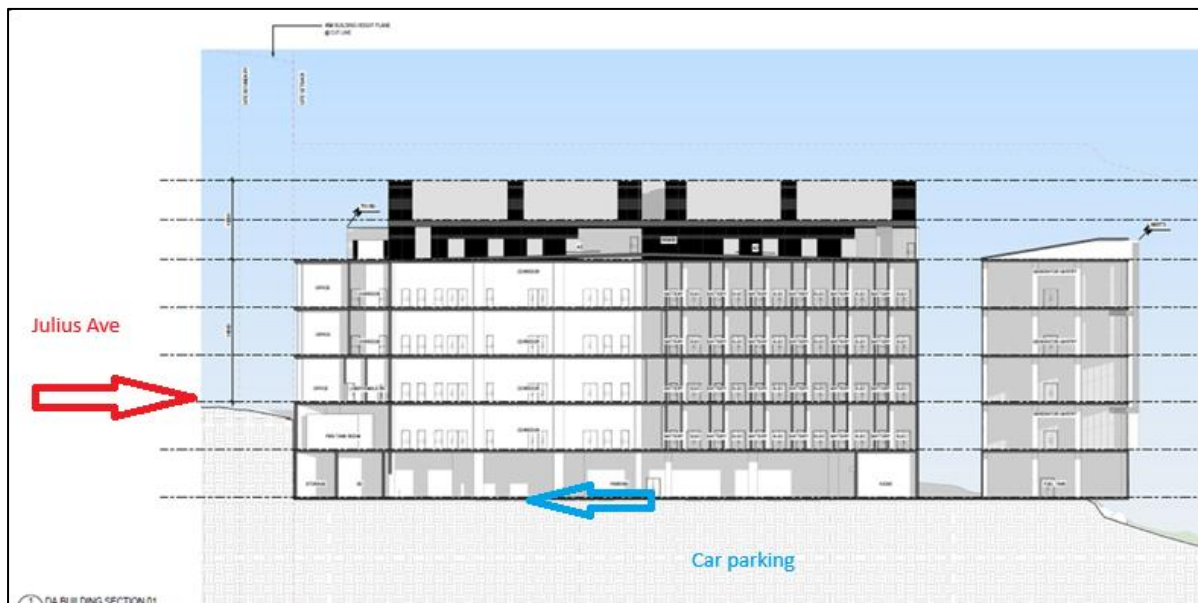


Figure 2. Ground Floor Car Parking Area (Source: Greenbox Architects, 2025)

2. RELOCATION OF STSS

As a result of the reduction in capacity identified above, there is a reduction in demand to the sub-transmission switching station (STSS) is reduced, allowing for the STSS to be located to the west of the building, rather than its former location which was located in a separate area to the south.



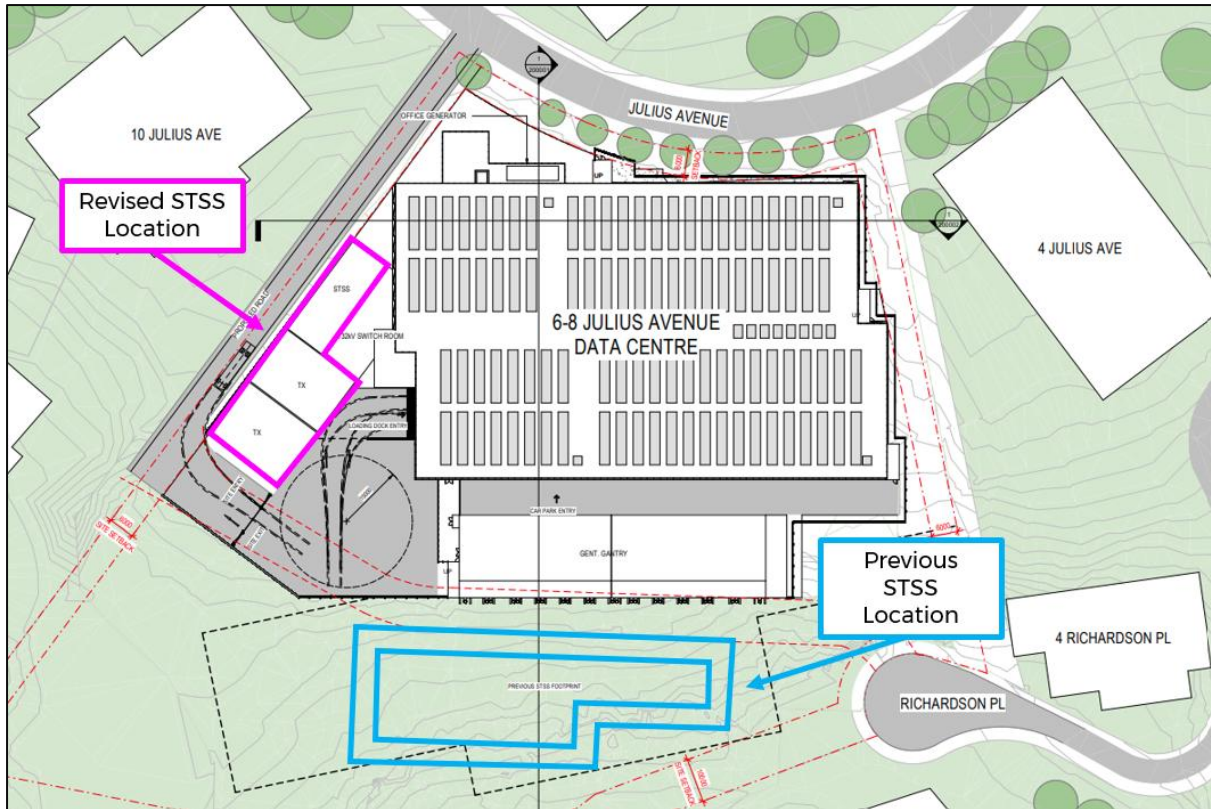


Figure 3. Location of STSS (Source: Greenbox Architects, 2025)

TABLE 2. CHANGES TO STSS		
Item	Previously Proposed	Proposed Through Amendment
Capacity	120MW	180MW
Location	Separated to the south of the proposed building.	Adjacent to the building to the west.

2.1. Justification

The justification for the relocation of the STSS is primarily centred around the reduction of clearing of vegetation on the subject site, as identified throughout submissions regarding the proposed development. The STSS will remain accessible by Ausgrid from an access road and shared driveway from Julius Avenue. This arrangement has been tabled with Ausgrid, which have verbally endorsed this approach.

This is considered to be an improved developmental outcome through a direct response to the submissions provided with regard to this project. This is primarily aligned to the reduced bulk and scale, which has flow-on effects to allow for reduced amounts of vegetation clearing required, as well as a lessened visual impact.

3. Removal of Richardson Place Connection

The proposed development now removes the previous extension of Richardson Place. This was proposed to extent from the existing cul-de-sac to an additional juncture point creating an additional connection to Julius Avenue. However, this resulted in additional vegetation clearing on the subject site and removal of the existing vehicular spaces benefitting tenants of 3 Richardson Place (Lot 12 DP876736).



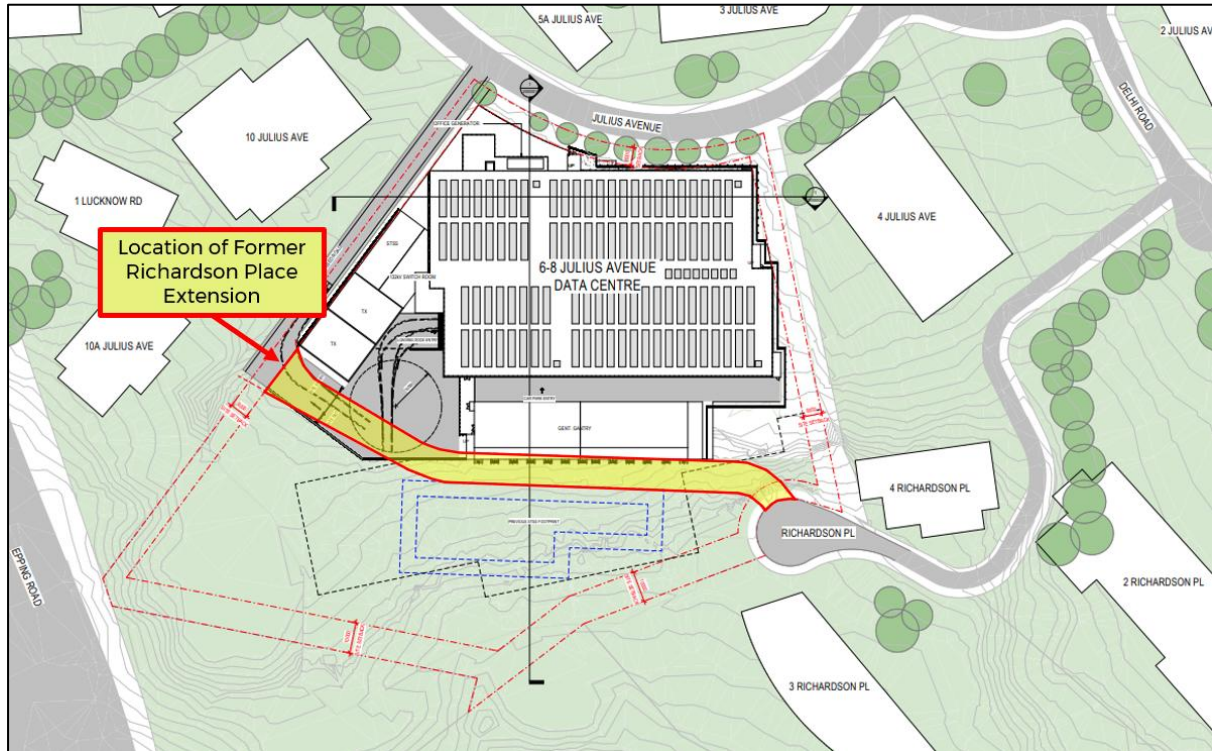


Figure 4. Proposed Removal of Richardson Place Extension (Source: Greenbox Architects, 2025)

3.1. Justification

The road connection provided was initially provided in alignment with the Macquarie Park Innovation Precinct Design Guide (Design Guide). However, due to additional areas of vegetation clearing and resulting in a larger scale of development, the road connection has been removed from the scope of works of this development. 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.

Additionally, through consultation with DPHI and the City of Ryde, there have been no objections to this approach to date. City of Ryde has previously requested that the road would not form a key element of the development.

4. Increased Street Activation to Julius Avenue and Additional Setbacks

In response to commentary from City of Ryde, a request for additional street activation was provided within their submission. As a result, 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 5. Former Building Elevation (Viewed from Julius Avenue) (Source: Greenbox Architects, 2025)



Figure 6. Proposed Building Elevation (Viewed from Julius Avenue) (Source: Greenbox Architects, 2025)

4.1. Justification

The basis of the increases to street activation is to directly respond to City of Ryde's concerns regarding the originally proposed design. In response to Council's concern and reconsideration of the Design Guide. Further, the overall reduction in the building bulk and scale has allowed for increased setbacks across the front and side elevations, improving compliance with the Design Guide, while also avoids relocation of sewer infrastructure into the existing verge area.



5. Removal of Western Pedestrian Walking Track

The previously proposed walking track on the western side of the subject site has been removed from the proposed development due to the absence of such a requirement under the Design Guide. Further, discussions have been undertaken with Friends of Lane Cove National Park. Through these discussions, it was confirmed that there was a preference to avoid disturbance by the retention of existing bushland rather than the provision of an additional pedestrian connection. Notwithstanding, the pedestrian link path to the rest of the subject site will be maintained.



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



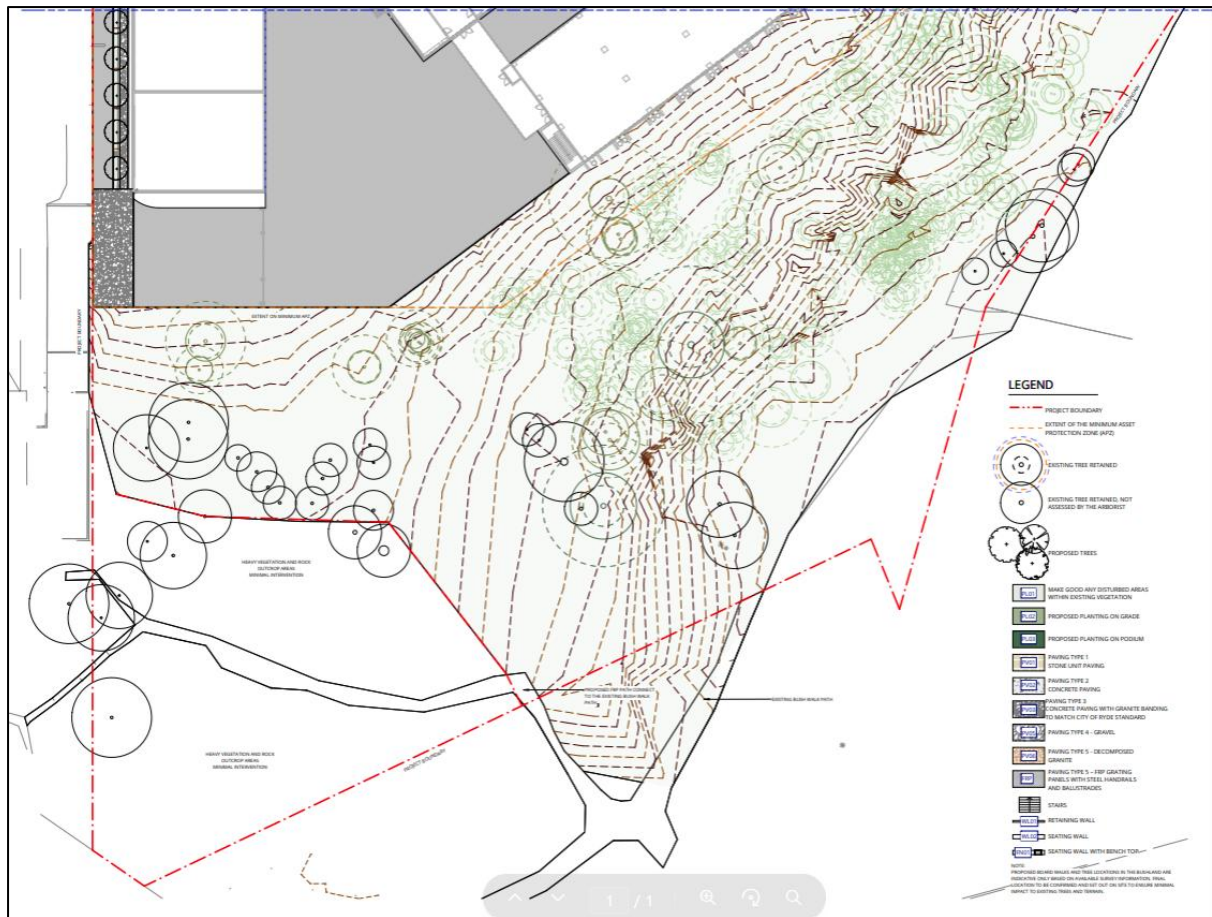


Figure 8. Proposed Removal of Western Walking Track (Source: Arcadia, 2025)

5.1. Justification

The removal of the western walking track was a direct response to the concerns raised by Friends of Lane Cove National Park, particularly with their preference to retaining bushland rather than an additional pedestrian connection. Notwithstanding, there still remains a pedestrian connection point through the site between Julius Avenue and the Great North Walk, towards the eastern extent.



CONCLUSION

In accordance with Clause 37, the amended SSD submission will be prepared in accordance with the *State Significant Development Guidelines* and lodged on the Major Projects website. It is therefore requested that DPHI's written confirmation of the requested amendment is issued given the justifications provided. The changes sought are considered to respond to the evolving nature of strategic planning framework within the precinct and will ensure a suitable scale and form of development can be achieved.

The updated application submitted to DPHI will comprehensively address all environmental assessment requirements and document consultation carried out to date with agencies and City of Ryde.

Should you wish to discuss the matter further, please do not hesitate to contact the undersigned.

Yours faithfully,

Should you require any further clarification, please do not hesitate to contact Andrew Cowan on 0413 555 638 or email acowan@willowtp.com.au of Willowtree Planning Pty Ltd.

Yours sincerely,



Andrew Cowan
Director
Willowtree Planning Pty Ltd

Appendix A - Revised Proposal Plans

