



STEP Inc

Community-based Environmental Conservation since 1978

27 August 2025

Department of Planning
State Significant Development

SSD 80018208, 6-8 Julius Ave Data Centre, North Ryde

STEP Inc is a local community-based environmental group, with a membership of over 500 in the Hornsby/Ku-ring-gai area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensure proper management of this bushland including ensuring its role as habitat for animal species. Our group has considerable experience and expertise in environmental issues and regenerating and preserving natural bushland and native vegetation.

STEP has a particular interest in Lane Cove National Park having published a popular walking map of the Lane Cove Valley and a comprehensive Field Guide to the Lane Cove Valley that covers the geology and biodiversity of the valley. Lane Cove National Park will be directly impacted by this proposed development.

STEP is strongly opposed to this proposal for several reasons. The site is unsuitable because of its environmental impact and the cumulative load it is likely to place on the provision of basic services required by the Macquarie Park region and the whole of Sydney, namely electricity and water supply. This latter impact has not been adequately assessed in the EIS.

More explanation is provided below:

Destruction of trees and habitat

It is proposed that over 500 trees will be removed. About 200 of these are regrowth on an area that was previously cleared some 15 years ago for development that did not proceed. These trees still provide ecological value in terms of habitat connectivity and urban cooling. The remaining 300 are on the edge of Lane Cove National Park. These are mature trees that provide vital habitat for wildlife. Cumulative developments in the North Ryde area are destroying trees with hollows. These trees take over 100 years to develop these essential nests for native animals and birds.

Replacement by replanting 143 trees on the site plus others elsewhere does not overcome this loss of habitat.

The landscape of the bushland area contains many rock outcrops and crevices. This is essential habitat for bats that have been recorded in this area, namely the Large-eared Pied Bat, the Little Bent-winged Bat and the Large Bent-winged Bat. Excavation required for the construction of the large data centre building will destroy this habitat.

Impact on bushland

The heat generated by the data centre will be controlled and dispersed via cooling towers. This is great for ensuring the safe operation of the centre but the steam emitted by the towers will impact on the bushland environment around the centre. What impact will the additional heat and

humidity have on the bushland and the Lane Cove River? This issue has not been covered in the EIS and must be addressed.

Visual impact

The EIS includes impact analysis that simulates the visual impact of the 51m high building on views from various locations. It is shown to create an unacceptable eyesore interrupting the beautiful continuous views of the Lane Cove Valley bushland from Epping Road and for visitors and residents that live near the national Park.

Cumulative demand for electricity

The EIS provides no information on the impact the operation of this Julius Data Centre will have on the availability and reliability of the electricity supply for residents and other businesses in the Macquarie Park areas. This development will add another 117MW of demand for electricity to the existing high demand from several other data centres in the Macquarie Park region, all within 5 km of Julius Ave. The other centres include

Air Trunk at 1 Sirius Ave, Lane Cove West– 120 MW
Goodman at 12 Mars Rd, Lane Cove West– 90 MW
NextDC S1, S2 and S5 - 3 centres totalling 106MW
Digital Realty (23 Waterloo Rd) – demand not available
Macquarie Data Centre – 85MW
plus centres operated by Amazon, Fujitsu and Macquarie University
(source www.datacentermap.com)

The Infrastructure Delivery, Management and Staging Plan explains that the capacity is currently not available for Ausgrid to deliver the required power and will have to be negotiated.

Greenhouse gas emissions and diesel back up system

The proposed data centre will rely entirely on the main grid to provide power. The users of the centre and other centres should be contributing to Australia's commitments to reduce greenhouse gas emissions by sourcing power as much as possible from 100% renewable sources.

It is extraordinary that a back up power system has to be available to provide complete redundancy with diesel generators supporting a total load of 169 MW. This requires a large amount of diesel fuel to be stored on site that poses a fire risk plus the release of a large amount of greenhouse gas emissions when it is used for testing and if a power failure does occur.

This type of system is out-of-date. Is it not possible to provide a battery back-up system that is coordinated with the other high energy demand users. If not, doesn't this demonstrate that there are too many high electricity users within the Macquarie Park area?

Demand for water

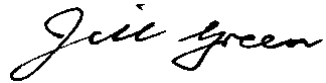
The Infrastructure Plan estimates that at peak usage, the water required will be 6.2 million litres per day, mainly to operate the cooling system. Some of this will be sourced from rainwater, when available. This is equivalent to about 30,000 households where the average is 200 litres per day.

There is increasing demand for water supply in line with the increasing population of Sydney plus the risk of future droughts reducing the availability of this supply. Has the water demand of this proposal, plus the demand from other data centres, been modelled in the light of the future demands for Sydney's water supply along with future climate scenarios. This information is missing from the EIS.

Bushfire risk

The site is categorized as bushfire prone in the Ryde City Council's Bushfire Prone Land Map (BPLM). The EIS reports consider that the APZs provide an adequate defendable space. However, it is acknowledged that the Ausgrid sub transmission switching station (SSTS) is not a part of this application, but nevertheless, that site also has the ability to provide a defendable space. How can this statement be made if details about the STSS are not provided.

Yours sincerely,

A handwritten signature in black ink that reads "Jill Green". The signature is written in a cursive, flowing style.

Jill Green
President