

**By COMMUNITY MEMBERS. OF LANE COVE COUNCIL's
BUSHLAND MANAGEMENT ADVISORY COMMITTEE (BMAC)
5 May 2066**

BMAC is a Lane Cove Council Advisory Committee with the objective of assisting Council in the formulation and implementation of bushland management strategies and initiatives. Within this objective BMAC provides this submission on SSD-82052708 (Lane Cove),

We have concerns about the impacts of this development and the cumulative effect of the enormous requirement of electricity and water, on noise impacts, on urban heat, on the natural environment including bushland and wildlife, impacts on wellbeing on local residents, on the local school, the Community Nursery, Blackman Park, all within the vicinity of the Lane Cove West Industrial area.

The cumulative effect of these impacts needs to be assessed and addressed.

Noise Impacts

Data Centres create significant noise pollution for local communities, primarily through 24/7 HVAC cooling systems and, the periodic testing of backup generators will. This low-frequency, humming noise can exceed 60-90+ decibels, causing sleep disruption, chronic stress, anxiety, and potential hearing loss for nearby residents. Clearly a concern for the health and well-being for local residents, workers in the Community Nursery and within the Mars Road Industrial area and the Primary School.

Unfortunately, the noise impacts have not yet been fully clarified in the EIS, and it was indicated that these details be made available at a later time. This is totally unacceptable and the information must be supplied before any final decision on this development can be considered.

The EIS does not sufficiently address the health impacts of diesel particulate matter i.e. PM2.5.

Data centres are significant sources of nitrogen oxides (Nox) primarily emitted through the use of diesel-powered backup generators, which are essential for maintaining high availability and uptime. These emissions contribute to localized air pollution, posing health risks to surrounding communities and contributing to the overall environmental footprint of the expanding AI infrastructure.

Water Use

The source for the water is Sydney Water, who supplies the water for all Sydney and the estimated amount of water for this facility is an average of 1,405 kilolitres (1.4 million litres) of water per day.

Concern is raised regarding is the amount of water this proposal needs, particularly in drought times, when the population has to drastically reduce their water consumption, but the facility would still need this resource. Even Water tanks would not suffice considering the amount of litres/day needed, because once used up, tanks cannot refill in drought conditions.

Cumulative High Demand on Electricity

As temperatures rise due to climate change, we will experience longer and more frequent heatwaves, as well as an increase in average temperatures.” (NSW Planning Website.)

The demand for electricity in residential areas during high weather temperatures, already puts strain on the Electricity System and due to the high demand of Data Centres, could result in devastating blackouts for communities. The cumulative effect needs to be considered of the Data Centres already built, those proposed and the likelihood of further applications within this close proximity.

So far:

- Sirius Road Data Centre – **120 MW (built)** – AirTrunk
- Apollo Place Data Centre – **45 MW** (Planning Approved but not built) – AirTrunk
- Mars Road Airtrunk – **140 MW** (At initial planning stage) – AirTrunk
- 12 Mars Road – **90 MW** (Public Submission stage) – Goodman
- 16 – 20 Mars Road – No MW details (at initial planning stage) – DC Alliance; and
- Microsoft Data Centre (anticipated) in nearby Mowbray Road ridge, adjacent to bushland and residential area

The normal requirement for an industrial development is 15 megawatts, tiny in comparison to these demands.

Cumulative Urban Heat and Thermal Load

The Environmental Impact Statement (EIS) fails to adequately assess the cumulative thermal impact of operating four hyperscale data centres in such close proximity. The concentrated release of waste heat from cooling towers will exacerbate the potentially raising local ambient temperatures by several degrees and impacting the health of nearby residents and the local school.

Loss of 90 Mature Trees

Losing so many trees in such an environmentally sensitive area is extremely concerning.

Biodiversity Offsets will not assist to obviate the loss in this environmentally sensitive area as they serve as a natural buffer between industrial development and Blackman Park and their loss will add a detrimental visual impact from the park.

This will also have an impact on biodiversity due to the site’s proximity to the Lane Cove River corridor and will affect the local wildlife and the adjacent Community Nursery.

Trees act as Environmental Buffers and the proposed excavation and tree removal could damage protected bushland and riparian zones.

The assessors of this development should consider the impact of tree loss together with the combined environmental footprint of multiple data centres in the Lane Cove West precinct.

Although the project ostensibly retains the trees on the eastern boundary adjacent to the Nursery, we believe the project will result in the loss of these trees due to impact on roots from deep excavation and construction impacts above ground, for example, lopping of the

trees to allow scaffolding and the strip on the eastern boundary becoming a construction zone.

Employment Opportunities

The statement that this facility will offer significant employment opportunities does not hold true. That would only be a temporary measure during the construction phase, after which the permanent staff is advised as only 26 employed.

We recall that the Department of Planning at the time the LEP was considered and approved in 2009, prime concern was employment increase in the Lane Cove West Industrial area.

The concern here is that it would seem that Data Centres have low employment opportunities in the long term.

Comments in relation to the Development Proposal and its impact on the Community Nursery.

We formally object to the proposed 28.5-metre building height and current site configuration at 12 Mars Road. As stakeholders concerned with the Lane Cove Community Nursery and the adjacent bushland, we believe the proposal significantly impacts this critical community asset in the following ways:

1. Unacceptable Building Height and Bulk

The proposed height of 28.5 metres is 10.5 metres (60%) above the **18-metre limit** set by the *Lane Cove LEP 2009*. This excessive height creates an overwhelming visual bulk that is inconsistent with the "functional and attractive" design objectives of **Part E of the Lane Cove DCP**. The building will dominate the Community Nursery, fundamentally changing its character from a natural, open-space-adjacent facility to an enclosed industrial corridor.

2. Infringement on Required Environmental Setbacks

Under **Part E and Part H of the Lane Cove DCP**, buildings adjoining open space or bushland must maintain a minimum 10-metre setback. Given the unprecedented height of 28.5 metres, a standard 10-metre setback is insufficient to mitigate the visual and environmental "looming" effect.

We request that a significantly larger buffer be mandated to protect the Nursery's operational footprint.

3. Impact on Solar Access and Plant Propagation

The Community Nursery relies on consistent solar access for the propagation of locally indigenous seedlings. A 28.5-metre structure on the southern/western boundary poses a severe risk of overshadowing, particularly during winter months. Any loss of sunlight will directly impede the Nursery's ability to provide tube stock for the Council's bushcare programs and 40% canopy target.

4. Risk to Riparian Health and Stringybark Creek

The site's proximity to Stringybark Creek requires a **20-metre riparian setback**. The proposed deep excavation (up to 8 metres) for the data centre infrastructure risks disrupting the water table and causing sediment runoff into the creek. This threatens the fragile ecosystem that the Nursery and local volunteers work to protect.

5. Operational Hazards: Dust and Heat

Data centres generate significant heat and require constant cooling. We are concerned that the discharge of hot air and dust generated during the construction of such a large-scale facility will create a microclimate detrimental to the sensitive native species grown at the Nursery.

Comments on the proposed Deep Excavations of the Site

Our primary concern is the significant environmental and structural risk posed by the proposed 8-metre-deep excavations required for the basement data halls.

We raise objections on the following grounds:

- **Environmental Risk to Riparian Zones:** The site adjoins protected bushland and the Lane Cove River corridor. Excavation at this depth threatens to disrupt groundwater levels and natural drainage, potentially causing irreversible damage to the nearby endangered saltmarsh community.
- **Impact on the Lane Cove Community Nursery:** As the nursery is directly adjacent to the site, the massive scale of excavation will subject native plant propagation to intense vibration and construction dust, as highlighted by the Lane Cove Council.
- **Loss of Native Habitat:** The Environmental Impact Statement (EIS) lacks a complete assessment of how deep excavation will destroy local rock outcrops and crevices that serve as critical habitat for local wildlife, such as the Large-eared Pied Bat.
- **Construction Disruption:** The three-year excavation and construction period will cause prolonged noise and vibration impacts on nearby families and Lane Cove West Public School, located only 50-100 metres away.
- **Insufficient Mitigation:** Recent data centre developments in the area have demonstrated that sediment controls are often inadequate for excavations of this scale, leading to severe downstream environmental damage.

Government Inquiry into Data Centres

The NSW Legislative Council's Public Accountability and Works Committee has commenced an inquiry into data centres in New South Wales. This inquiry, the first of its kind in Australia, aims to ensure that the State is adequately prepared for the scale and pace of data centre development.

Key areas of focus include the planning frameworks, electricity demands, grid impacts, water usage, and environmental impacts on local communities.

The inquiry will also consider the social and environmental impacts of the rapid growth of data centres and determine whether there are adequate safeguards in place. The inquiry is expected to provide a comprehensive report by 30 September 2026 addressing the concerns raised by the community and stakeholders regarding the development and regulation of data centres in NSW.

We hope the Inquiry leads to a moratorium until the findings are finalised and planning guidelines established and a Planning Instrument established for Data Centres.

Conclusion

This Data Centre application should be refused due to the many impacts and issues this submission has identified:

- Significant Noise and Diesel particulate and NOx Pollution and their cumulative effect
- Insufficient information on Noise supplied by the applicant
- High Demand on Water and Electricity and their Cumulative effect
- Cumulative Heat and Thermal Load
- Loss of 90 trees and its effect on biodiversity on this and combined environmental footprint of data centres in Lane Cove West
- Loss of employment opportunities in the Lane Cove West Industrial area (noted only 26 employees proposed).
- Unacceptable Building Height and Bulk
- **Impacts on Community Nursery** including
 - Infringement on required environmental setbacks,
 - Impact on solar access and plant propagation
 - Risk to Riparian Health and Stringybark Creek
 - Operational Hazards: Dust and heat on Nursery and local residences
 - Construction disruption – three-year construction and excavation period will cause prolonged noise and vibration impacts on the Nursery, local residences and the local school
- Excessive Excavations of the Development Site threatens to disrupt groundwater levels and natural drainage, lead to loss of Native Habitat
- Environmental degradation

Additionally

1. Ensure all the information not yet provided regarding Noise has been provided by the applicant and when all the facts are available, be put out again for community consultation
2. Adhere to the 18-metre height limit and provide expanded setbacks that respect the Community Nursery's vital role in our local environment and protect the line of trees on the eastern boundary
3. Provide a more robust, independent assessment of the long-term hydrogeological and ecological impacts of such deep excavation in this sensitive location
4. Take into account the cumulative effect of impacts from multiple data centres within a confined local area.
5. Reduce the number of Data Centres in a confined area to alleviate the cumulative impacts on communities and the environment

Thank you for the opportunity to respond.

For and on behalf of the Community Members of BMAC

Frances Vissel

Vice-Chairperson – Bushland Management Advisory Committee