

RE: OBJECTION TO SSD-84467726 — KOGARAH GOLF CLUB REDEVELOPMENT — CONCEPT PROPOSAL AND STAGE 1 (EARLY) WORKS

I am writing to formally object to State Significant Development application SSD-84467726, the Kogarah Golf Club Redevelopment Concept Proposal and Stage 1 Works, lodged by Stockland Development Pty Limited in joint venture with John Boyd Properties, currently on public exhibition.

The application seeks concept approval for a precinct of up to five building blocks, as tall as 70 metres, delivering in the order of 340,000 square metres of gross floor area on the former Kogarah Golf Club site at 13-19A Marsh Street, together with Stage 1 site preparation, demolition, vegetation clearing and bulk earthworks. I object to this application in its current form.

My objection is grounded in three matters: the serious environmental and social consequences of large-scale data centre uses within the concept proposal; the loss of green, open space that the local community relies on; and the need for restoration, not further development, along the Cooks River foreshore. I ask that the Department not progress this application further until the outstanding matters set out below are properly addressed.

1. Data centres: environmental and social impacts that have not been addressed

The concept proposal includes a data centre of approximately 25,400 square metres, alongside warehouse, distribution, hotel, commercial and other floorspace, as one of the permissible uses across the five building blocks. This is not a minor or incidental inclusion. Large data centres carry environmental and social impacts that are fundamentally different from, and more severe than, conventional warehousing, and this application has not demonstrated that those impacts have been assessed or can be managed.

Environmentally, hyperscale data centres draw continuous, high-load electricity demand, are commonly supported by diesel back-up generators that create local air quality, emissions and noise impacts, and require significant volumes of water for cooling. Data centres already account for a growing share of NSW's grid-supplied electricity, and, according to the Australian Greens, this share is expected to reach around 11 per cent by 2030. Introducing a data centre into a residential and river-adjacent context at Kogarah, without any assessment in this concept application of its energy source, back-up generation, cooling method, water use or 24-hour noise profile, leaves the community unable to properly understand what it is being asked to accept.

Socially, data centres are typically high-security, low-occupancy facilities that generate little to no public activity and can require permanent fencing and restricted access. Locating a data centre of this scale on land immediately adjoining the Cooks River foreshore risks sterilising a significant length of riverfront behind security fencing, directly undermining the public open space and foreshore access benefits that this same application relies on to justify its scale. The concept approval sought would lock in a land use mix, including data centres, without the detailed environmental, noise, energy and public access assessment that a use of this nature demands.

This application should not proceed ahead of the NSW Parliamentary Inquiry into data centres.

The NSW Legislative Council's Public Accountability and Works Committee established a dedicated inquiry into the development and regulation of data centres across New South Wales on 29 January 2026. That inquiry is examining precisely the issues raised above: the scale and pace of data centre development, energy demand and grid impacts, water use and security, noise and air quality from back-up generation, impacts on surrounding communities, and whether the current planning framework, including the use of State Significant Development pathways and fast-track mechanisms, is adequate to manage these impacts. The Committee is due to report by 30 September 2026.

It would be indefensible for the Department to grant concept approval for a data centre use of this scale while the NSW Parliament's own inquiry into the very same issues is still underway and has not yet reported. Approving this application now would pre-empt and potentially undermine the findings and recommendations of that inquiry, including any recommendations on planning triggers, energy and water cost recovery, back-up generator standards, or community safeguards that may directly apply to a proposal of this kind. I therefore submit that SSD-84467726 must not be determined until after the Public Accountability and Works Committee has published its findings and recommendations, and the NSW Government has had the opportunity to respond to them.

2. Loss of green space to the local community

The site is one of the largest remaining areas of open, green land in this part of the Bayside and St George area. Its conversion from a golf course into an industrial and logistics precinct of up to 70 metres in height represents a significant and irreversible loss of green space to a community that already has limited access to open, undeveloped land. While the concept proposal nominates a portion of the site for dedication to Bayside Council as public open space, a meaningful share of that area is presently occupied by the stalled M6 Stage 1 motorway construction compound and is likely to be degraded, compacted land rather than genuine, established green space. Describing this land as a community benefit is misleading when much of it must potentially be remediated, with no apparent binding timeframe, design or funding commitment provided as part of this application.

Approving the concept plan of buildings up to 70 metres in height and 340,000 square metres of floor area, on the strength of a promise of future open space that is neither guaranteed nor costed, asks the community to accept a certain and permanent loss in exchange for an uncertain and deferred gain. The application should not proceed until the precise area, quality, staging and funding of genuine public open space is fixed as a binding condition.

3. Cooks River foreshore: restoration, not redevelopment

The northern portion of the site directly adjoins the Cooks River, one of Sydney's most heavily modified and environmentally stressed urban waterways. The Cooks River Alliance has itself called on the Department to secure stronger environmental safeguards, public access outcomes and river rehabilitation commitments before any approval is granted for this project.

Decades of industrial and infrastructure use have left the Cooks River foreshore in need of ecological repair, bank restoration, water quality improvement and rehabilitated habitat, including habitat relied upon by the Green and Golden Bell Frog and other threatened and migratory species historically recorded on this site. A concept proposal of this scale, height and floor area, built up to

the river's edge, represents further intensification of this foreshore rather than the restoration it urgently requires.

There is a clear precedent, close by, for choosing restoration and open space over further built form on golf course land. At Moore Park, the NSW Government is converting approximately 20 hectares of the existing golf course into permanent public parkland, in direct recognition that this land is better used to meet the community's need for accessible green space than to be retained for its previous single use. Kogarah, similarly, presents a rare opportunity to return a large tract of single use golf course land adjoining a degraded urban river to genuine public and ecological benefit, rather than to a further 340,000 square metres of built form. This opportunity should not be lost to an industrial and data centre precinct.

Further, restoration options for the foreshore need not be limited to conventional parkland. Councils across Sydney, including Sutherland Shire, Inner West and Camden, have established micro-forest programs: small, densely planted native plantings, that establish quickly, cool the local microclimate, absorb carbon and stormwater, and rebuild habitat and biodiversity in urban areas at relatively low cost. A Cooks River foreshore strategy for this site built around restoration and micro-forest planting, rather than a logistics and data centre precinct, would do far more to address both the community's need for accessible green space and the urban heat and climate pressures facing this part of Sydney.

Any consent for this site should place river restoration, riparian rehabilitation, micro-forest and habitat planting, and public foreshore access ahead of, and as a genuine precondition for, further built form, rather than treating restoration as a secondary or voluntary add-on to a logistics and data centre precinct.

For the reasons set out above, I object to SSD-84467726 in its current form. I ask the Department to:

- Not consider this application until the NSW Legislative Council's Inquiry into Data Centres has published its findings and recommendations, and the Government has responded to them.
- Require full and specific environmental assessment of any proposed data centre use, including energy source and grid impact, noise and back-up generator emissions, flood profile risk, water use, and public access, before any data centre floorspace is approved; and
- Require binding, funded and timetabled commitments for genuine, high-quality public open space and Cooks River restoration and foreshore access as a precondition of any consent, not a deferred promise;

Thank you for considering my submission. I would welcome the opportunity to be kept informed of further stages of this assessment.

Kind regards

Justine Lawson
Wolli Creek