

# Friends of Lane Cove National Park Inc.

## RE: Additions to submission by Friends of Lane Cove NP on Biodiversity Impacts of the proposed Data Centre at 6-8 Julius Avenue.

While Friends of Lane Cove National Park strongly believe that the best outcome with this project is to minimise the loss of biodiversity, we feel that it is important to also ensure that there is the maximum off-set for any losses. We were particularly concerned with the comment by ISPT in a letter to Friends of LCNP that they would be planting 750 native trees as offset compensation. We could not understand where this came from as it did not fit with the BDAR. It now appears that it is based on discussions between ISPT and City of Ryde Council at the pre-EIS meeting, where according to the minutes of that meeting council planners have told ISPT that council's tree policy would apply. Although with a 3:1 ratio and the acknowledged removal of 509 trees it is hard to make the numbers add up.

*Trees removed as a consequence of Development Application approval must be replaced, in accordance with Section 6 of the Urban Forest Technical Manual, to effectively maintain the Urban Forest canopy Tree replacement plantings should be undertaken on a ratio of 3 to 1 in accordance with Councils draft Development Control Plan (Part 9.5) – Tree Preservation*

However, this is not the case, both the fact that this is a State Significant Project and that more than 0.5ha of land on a block of more than 1.0 ha triggers the Biodiversity Offset Scheme (BOS) which is mandated under the NSW Biodiversity Conservation Act 2016. It applies to SSDs and requires developers to assess and offset biodiversity impacts — including vegetation and tree removal — through accredited methods.

The other planning document in this area, the Macquarie Park Design Guide is just that a guide, it does not override statutory environmental obligations. The BDAR recognises that the BCA applies and enumerates the required offset credits. However as previously noted Friends of LCNP strongly believes that a TEC occurs on the site which would substantially increase credits.

### Additional access and viewing platform.

The proponent is intending to cut additional pathways and instal viewing platforms into the small amount of remaining bushland in the current program. Unfortunately, each additional pathway will not only clear more of the bushland that it is 'opening up' it will also provide access for invasive weeds. We feel that a better outcome would be to finance upgrades and maintenance of the existing pathways that were installed during the CSIRO site development in the 1990's and keep any new pathways to a minimum.

### Stormwater management.

We share council's concern with the storm water management: *The OSD basin would appear to be designed to overflow into the National Park land and would appear to dissipate these flows over the downstream area.* Unless agreed to by NPWS this does not appear to be acceptable. Will cooling water also use this system?