

**Re: Objection to SSD-80018208 / Julius Avenue Data Centre development, North Ryde**

**From: Willoughby Environmental Protection Association**

**Date: 27 August 2025**

As a local community group dedicated to the care and protection of Sydney's unique urban bushland and wildlife, The Willoughby Environmental Protection Association (WEPA) emphatically objects to the proposed construction of a data centre and new road through the bushland site in Julius Avenue, North Ryde. The site sits within Lane Cove National Park, an area mapped as a Threatened Ecological Community, *Coastal Enriched Sandstone Moist Forest*, and as such must be preserved and protected.

We are greatly concerned that the project involves the removal of 509 mature habitat trees, and the potential damage to surrounding bushland and the Lane Cover River through the excavation and construction process. We also have concerns about the impact of ongoing data centre operations on native species living and moving through this critical wildlife corridor.

We urge the NSW Government to consider the extensive environmental harm that will result from this project and recommend relocation, distancing the data centre from sensitive native bushland.

WEPA strongly objects to the Julius Avenue Data Centre proposal based on –

### **1. Inadequate assessment by the developer**

A demonstration of avoidance of negative biodiversity impacts is the fundamental first step in the project approval process, under the *Biodiversity Conservation Act 2016*. Before considering offsets, developers must demonstrate that they have taken all reasonable steps to avoid harm to biodiversity values and identify conservation measures. The Biodiversity Development Assessment Report (BDAR) provided by SLR Consulting does not indicate any attempt by the developer to avoid impacts to native vegetation and threatened species.

### **2. Impact of build on tree canopy & biodiversity**

The proposed removal of 509 mature trees from a Threatened Ecological Community is unacceptable. It would result in a significant loss of habitat for protected native species already struggling to survive in a hostile urban environment. The considerable narrowing of an important wildlife corridor along the river foreshore presents a real threat to wildlife safety. The high number of tree removals also adds to the broader environmental burden by increasing the urban heat load, impacting human health and wildlife health and safety.

Acknowledging the benefits of a healthy canopy, the NSW Government has committed to increase Greater Sydney's tree canopy to 40% by 2036. State Government mapping by ArborCarbon in 2022 indicates that we are barely halfway to this target – measuring tree canopy across Greater Sydney at just 21.7%. Sydney's Northern regions experienced the greatest loss of coverage according to this scientific study. The Ryde LGA lost almost 8% compared to 2019, Lane Cove -6% and Willoughby -5%. Apart from the critical role tree cover provides for wildlife and biodiversity, there are also numerous human health benefits delivered through cooler temperatures and clean air. It is imperative that established, high-value urban tree cover is protected.

We are particularly concerned about the reduction of the vital foreshore habitat corridor and the loss of many established tree hollows. These are vital for nesting and species survival and take many decades to form. The Lane Cove National Park is home to at least 14 threatened or vulnerable species, which will be put at greater risk by tree removals and building activity.

Another major concern is the loss of significant rocky outcrop and cave formations. These are known to provide critical habitat for three threatened species of microbats, including -

- Large-eared Pied Bat – listed as **Endangered** in NSW
- Large Bent-wing Bat – listed as **Vulnerable** in NSW
- Little Bent-winged Bat – listed as **Vulnerable** in NSW

The biodiversity offset system, or species credits payment to permit adverse impacts to sensitive ecological areas and threatened species, is problematic for many reasons, including the fact that recent inquiries found these to be facilitating a state of decline for NSW biodiversity and a net loss to nature. The 2024 State of the Environment NSW report highlighted these failures, with an additional 18 species added to the threatened species list since December 2020, and a prediction that only half of those listed are likely to survive the next century. In November last year the NSW parliament made a commitment to deliver a net positive for nature. In this particular instance, the threatened bat species depend upon unique types of habitat - caves and rocky outcrops that cannot be replaced by planting trees elsewhere. The NSW Government must adhere to their commitment and ensure the protection of these species by safeguarding habitat critical to their survival.

### 3. Operational impacts

Beyond the building process, which presents a high pollution risk to surrounding bushland, streams and the Lane Cove River, consideration must be given to the fact that data centre operations create ongoing forms of pollution. The 24/7 operation will generate light and noise pollution, and heat from high-powered computing machines. Locating a data centre in close proximity to sensitive wildlife habitat should not occur for numerous ecological reasons, including -

- **The Urban heat island effect will be intensified.** Ongoing data centre operations will add to the increased heat caused by the canopy reduction. Recognised expert in urban heat Professor Sebastian Pfautsch recently conducted a heat study across the Willoughby LGA, including the site of one of Sydney's most significant tree vandalism events at HD Robb Reserve in Castle Cove, where 260 trees were killed in bushland reserve in 2023. Pfautsch warned of the detrimental ripple effects of temperature shifts on surrounding bushland, impacting insect life and biodiversity due to hotter days and cooler nights in the affected area. The additional heat generated by data centre operations will exacerbate the risk to wildlife, and human health.
- **Harmful artificial light generated by the 24/7 operation will have a negative impact on wildlife.** Unnatural light spilling into the surrounding bushland will be detrimental to native wildlife. Natural habitats become unsuitable, and species exhibit numerous physiological and behavioural changes, impacting feeding, breeding, immunity, flowering, and spawning. Night light is beneficial to invasive predators like foxes and cats and, when combined with a diminished foreshore corridor and connectivity, will further increase the risk to wildlife. These effects can threaten biodiversity and reverberate through ecosystems. In addition to excessive light, wildlife will be disturbed by noise pollution created by generators, coolers, server halls and other operational aspects of the 24/7 facility.
- **Wildlife risk of injury and death through car movements and diminished habitat corridor.** This 24/7 facility, which includes parking for 115 cars, raises concerns over the impact of increased car movements in a wildlife-rich zone. It is likely to result in wildlife strikes, injuries, and fatalities. Swamp wallaby, short-beaked echidna, long-nosed bandicoot, lace monitor lizards and python are among the protected species that reside within LCNP and will be vulnerable to cars. This threat is increased by a reduction in the protective corridor available to wildlife.

#### 4. **Negative impact on the amenity and experience of recreational users of Sydney's iconic Great North Walking Track**

This facility will be encroaching on one of Sydney's most popular shared public recreation spaces. As Sydney's population grows and high-density housing increases, it is critical that the State Government preserves existing outdoor recreation spaces in Sydney, particularly those that provide an opportunity to connect with nature. The Great North Walking Track is a prized public asset, affording invaluable physical and emotional wellbeing benefits to residents and visitors.

The proposal from ISPT to place a data centre adjacent to Lane Cove National Park, an extremely valuable community and biodiversity asset, is highly flawed. WEPA urges the NSW Government to reconsider the location of this project and find an alternative that results in less harm to the natural environment. At the very least a redesign should be required to preserve and protect the majority of the unique and vulnerable habitat on this site.