Vikram Pulakhandam
15 Tessa Street, Chatswood, NSW 2067
0432636456
vikram.pulakhandam@gmail.com

27th August 2025

To: NSW Department of Planning, Housing and Infrastructure

Re: Objection to proposed data centre at 6–8 Julius Avenue, North Ryde (adjacent to Lane Cove National Park) by ISPT

Reference: SSD-80018208

Executive summary

This proposal is a very large, power- and water-intensive, diesel-dependent data centre immediately adjacent to Lane Cove National Park that clears over a hectare of native vegetation and removes 500+ trees, with significant residual impacts on threatened species and community amenity; the public benefits are thin, diffuse, and largely unenforceable compared with irreversible environmental costs. It is inconsistent with core planning principles (precaution, biodiversity conservation, intergenerational equity), undermines Park edge conditions, and poses unacceptable construction, hazard, and microclimate risks. Refusal is the proportionate outcome.

Site and proposal overview

- Proponent and use: ISPT-financed hyperscale data centre to be leased to large cloud tenants.
- Scale and utilities: Approximate 169 MW peak power draw; large diesel backup (~1,272,000 L on site) and lithium-ion storage (~35,280 kg); estimated water use ~8 ML/day; ongoing jobs ~50; building height exceedance of ~13% attributed to rooftop plant.
- Context: Directly adjacent to Lane Cove National Park on steep, sandstone terrain with mapped native vegetation and threatened species habitat at the Park interface.

Grounds for refusal

Biodiversity and vegetation loss (avoidance not demonstrated)

- Clearing of ~1.33 ha of native vegetation (principally Sydney Coastal Enriched Sandstone Forest) and removal of 509 trees on a National Park edge is an unacceptable impact that cannot be “offset” without losing site-specific ecological function, edge buffering, and habitat connectivity.
- The proposal identifies likely impacts to threatened bats (Large-eared Pied Bat Chalinolobus dwyeri; Little Bent-winged Bat Miniopterus australis; Large Bent-winged Bat Miniopterus orianae oceanensis) and threatened flora (Darwinia biflora, Deyeuxia appressa, Hibbertia spanantha, Rhizanthella slateri); for Park-edge species, noise, light, heat, and hydrological edge effects add to direct clearing impacts.
- The design does not credibly demonstrate avoidance of biodiversity impacts or a compelling site dependency that outweighs the ecological value of this Park interface location.

Water, power, and climate risks at a sensitive interface

- A ~169 MW peak draw and absence of firm, additional renewable supply (beyond non-binding “options”) externalise grid emissions and reliability risks to the community while concentrating heat rejection at a biodiversity-sensitive edge.
- Estimated water use of ~8 ML/day is excessive for an urban drought- and heat-prone catchment; no transparent water balances, recycled water commitments, hybrid/dry cooling caps, or heat-reuse measures are provided sufficient to mitigate risk under extreme conditions.
- Siting high-intensity thermal loads next to the Park is a poor climate-resilience decision and undermines regional emissions and water-security objectives.

Bushfire and hazardous materials hazard

- Storing >1.27 million litres of diesel and substantial lithium-ion capacity in a bushfire-exposed location adjacent to the Park raises ignition, smoke, and emergency access/egress risks; a credible worst-case analysis shows disproportionate ecological and community consequences.
- Fuel spill, thermal runaway, or generator exhaust scenarios cannot be justified at a Park edge where receptors include sensitive ecosystems and residential areas downwind.

Construction and operational amenity impacts

- A 238-week program (~4.5 years) with ~69,000 m3 of cut on steep terrain creates sustained noise, dust, sediment, and heavy haulage risks; even best-practice controls have non-trivial failure probabilities over multi-year schedules with intense rainfall events.
- “Level spreader to bushland” disperses stormwater and sediment risk into Park slopes; externalising hydrological risk to a protected area is inappropriate and fragile under high-intensity storms.
- Acceptance of “short-term” NO2/PM2.5 exceedances in outage events is not compatible with a Park-edge location; low probability is not low consequence for sensitive ecological and residential receptors.

Urban heat, microclimate, and canopy loss

- Heat rejection and mechanical plant increase local temperature and dry stress, degrading Park microclimates during heatwaves; removal of 500+ trees diminishes canopy, wildlife corridors, and thermal buffering at the Park interface.
- Replanting and offsets cannot restore mature canopy function or mitigate thermal plumes and noise/light spill into the Park.

Weak economic/public benefit case relative to impacts

- Ongoing jobs (~50) are minimal for the footprint and intensity; many roles are outsourced or low-skill, and benefits accrue to a private owner-operator and global tenants while risks and infrastructure burdens are socialised.
- The public interest is not served by concentrating hazards and environmental costs at a Park boundary for diffuse digital benefits that can be achieved at lower-impact industrial sites.

Height exceedance and cumulative intensification

- A ~13% height exceedance, rationalised as “plant,” evidences over-intensification; approval would set a precedent for tall, power-dense forms at a fragile Park edge, compounding fragmentation and edge effects over time.

Statutory and policy considerations

- Ecologically Sustainable Development: Precautionary principle, conservation of biodiversity and ecological integrity, and intergenerational equity weigh heavily against siting hazard- and impact-intensive infrastructure at a National Park interface when alternative industrial locations exist.
- Threatened species significance: The scale, location, and multiplicity of edge effects indicate likely significant impact thresholds; avoidance is the appropriate first response, not offsetting.
- Public interest and amenity: Long construction duration, noise/air exceedance risks, traffic, and hydrological hazards to a protected area conflict with the public interest and the community’s reasonable expectations for Park-edge stewardship.
- Strategic alignment: The proposal undermines conservation objectives for Lane Cove National Park and regional strategies for green infrastructure, urban canopy, and biodiversity corridors.

Context: Jevons paradox and cumulative demand

- Efficiency in compute lowers cost per unit of work and expands total consumption—a rebound effect known as Jevons paradox (William Stanley Jevons, the famous British Economist); as GPUs/CPUs/AI inference become cheaper per task, total workload and absolute energy/water demand grow.
- This dynamic means “efficiency” claims cannot justify high-impact siting at sensitive Park edges; robust siting controls and avoidance are required to prevent cumulative, location-specific degradation even as per-unit efficiency improves.

Requested determination

Refuse development consent on environmental, hazard, amenity, and public-interest grounds, including unacceptable biodiversity loss, failure to demonstrate avoidance and alternative siting, excessive hazard concentration (diesel/batteries) at a bushfire-exposed Park edge, inadequate mitigation for water/heat/noise/air impacts, and unjustified height exceedance.

Minimum enforceable conditions if consent is contemplated

- Avoidance and scale: Redesign to eliminate height exceedance; avoid all mapped native vegetation and tree removal contiguous with the Park; reduce envelope and mechanical plant intensity at boundaries.
- Biodiversity: Prohibit clearing that triggers significance thresholds; require verifiable net-gain habitat outcomes on contiguous lands with binding, long-term management and performance monitoring.
- Water and cooling: Mandate hybrid/dry cooling with capped daily water budgets tied to drought triggers; require recycled water supply prior to operation; prohibit potable-water cooling except under emergency, with offsets insufficient as substitutes.
- Energy and emissions: Require contracted additionality ≥110% of annual load with firming prior to operation; implement heat-reuse to district loads where feasible; publish real-time power factor, load, and emissions intensity.

- Hazardous energy storage: Relocate/downrate diesel and batteries; increase setbacks, bunding, and fire-rated separation from the Park; require independent fire engineering peer review and scenario testing.
- Construction controls: Independent Environmental Representative with stop-work authority; continuous turbidity, noise, and particulate monitoring with public dashboards; sediment basins sized for extreme rainfall; strict haulage curfews and clean-truck standards.
- Noise and air quality: No NO2/PM2.5 exceedances at ecological and residential receptors, including during outages; dual-path filtration and load curtailment plans for adverse meteorology.
- Transparency and community benefit: Publish real-time water, energy, and emissions data; establish a community benefit agreement supporting urban canopy restoration and local biodiversity management proportional to site load and footprint.

Heritage perspective

William Stanley Jevons, reporting on Sydney's landscape, wrote in the Sydney Morning Herald in 1858 of "the bright sky above, the clear blue water below, the varied form and slope of the land, the solid dry base of sandstone, the wide country which lies open before us, for the free use of all," compelling us to "**acknowledge how much Nature has done for us, how little we have done for ourselves**." That civic duty persists today: high-intensity digital infrastructure should not be placed on the very edge of Lane Cove National Park where the losses are permanent and the benefits diffuse.

Conclusion

For the reasons set out above, please refuse consent. If capacity is required, redirect this use to pre-disturbed industrial sites with enforceable low-water, low-emissions design and robust buffers from protected areas and residential communities.

Best regards,

Sincerely,

Vikram Pulakhandam

Chatswood, NSW 2067