The proposed development, "Julius Avenue Data Centre City of Ryde" 6-8 Julius Avenue, North Ryde, Lot 89 in DP1082131, is unacceptable. I strongly OPPOSE/OBJECT to this development. The proposed data centre is not appropriate for this location in either construction or ongoing operation.

PUBLIC COMMENT PERIOD SHOULD BE EXTENDED, SINCE DEVELOPER HAS INTENTIONALLY DECEIVED ABOUT AND PREVENTED COMMUNITY CONSULTATION ON THE ACTUAL DEVELOPMENT PROPOSAL. EIS Appendix 28 - Social Impact Assessment WAS DELIBERATELY CORRUPTED, TO ENSURE THAT ONLY 5 PEOPLE WERE SURVEYED AT ALL, AND THESE WERE JUST ASKING IF THEY AGREED WITH PRE-WRITTEN MARKETING STATEMENTS THAT WILL NOT REALLY BE ACHIEVED BY THE SPECIFIC PROPOSAL.

I am aware the Mayor of Ryde, Trenton Brown, has written to NSW State Government requesting an extension to this extremely brief public consultation process and this too should be granted. The developer has INTENTIONALLY deceived the general public as to the actual nature of this proposed development, (in, for example, EIS Appendix 28 - Social Impact Assessment.pdf) ensuring they do not think to make a submission opposing its actual nature until it is too late.

The developer provides the following misleading claimed 'summary' of their project in numerous different documents in this proposal, evidently hoping that nobody reads any more details about the actual proposal. This exact same table is repeated in many of the developer's documents, including but not limited to EIS Appendix 28 - Social Impact Assessment.pdf p. 6, "Table 1: Development Proposal Summary" and SEARs Request - Julius Avenue Data Centre.pdf. SEARs Request - Julius Avenue Data Centre.pdf is addressed to "NSW Department of Planning, Housing and Infrastructure " implying the developer has also previously tried to deceive the state government over the nature of its proposal, as on p. 20:.

"Part 6 - Environmental Management & Sustainability

Canopy Coverage and Biodiversity

The Proposal achieves the objectives of this Part of the Design Guide in the following manner:

a) Recreates environmental values across the precinct consistent

with Country.

b) Maximises the future mature tree canopy and vegetation

coverage across the Precinct, providing a green and healthy

environment that supports active lifestyles.

c) Ensures no net loss of tree canopy coverage within development

lots.

d) Achieves a Net Positive Impact on biodiversity. "

Thus the developer is actively trying to deceive even Department of Planning, Housing and Infrastructure that if they make empty untrue claims then the development will be mindlessly ticked off without anyone checking that these are inaccurate, deceptive mistruths. In actuality, the proposed development results in a substantial net LOSS of trees and net LOSS of "tree canopy coverage within development lots" and a substantial net NEGATIVE "IMPACT on biodiversity". It also, of course, does not "Recreates environmental values" merely destroys the ones that are already there. It does not "provide a green and healthy environment and support active lifestyles" either, it just creates pollution (in general and from light, heat, noise, blinding reflection during the day and 24 hour light pollution at night, toxic diesel fumes and non-renewable greenhouse gas emissions), noise and a dangerous heat island effect and extreme fire risk. This is compounded by the negative environmental impact from removing the current forest, even before the ongoing operation of the proposed data centre. Although all these statements are untrue, it is additional impunity that they make claims of a quantitative nature that are so obviously incorrect, like "no net loss of tree canopy coverage" and/or "a net positive impact on biodiversity" ! And later the developer makes even more extreme claims, that there will be a "doubling" of tree canopy on the site, (EIS - Julius Avenue Data Centre 240625.pdf p. 81/94) when this is both untrue and impossible.

These misleading statements are repeated in the supposed "summary" the developer uses to mislead the public about its development, with statements like "No net loss of trees" [sic] (EIS Appendix 28 - Social Impact Assessment.pdf p. 6, "Table 1: Development Proposal Summary").

Yet elsewhere in the developers' proposals, we see that so many trees and plants will be removed that nobody has counted them, but as the developer elsewhere admits (EIS Appendix 12 - Landscape Design Report.pdf P. 25; p. 27)) a MINIMUM of "509" mature trees, most of them in a functioning forest ecosystem, will be destroyed, and the 'landscaping' then only proposes "133" replacement plants, most of which are shrubs that are not trees at all, and anyone who can count can see that this is a net LOSS of trees, and the removal of the forest is a net LOSS to biodiversity, and this empty marketing slogan that their development instead is somehow a "a net positive impact on biodiversity" is a blatant LIE.

EIS Appendix 12 - Landscape Design Report.pdf P. 25 "TOTAL INDIVIDUAL TREES BEING REMOVED 509"

EIS Appendix 12 - Landscape Design Report.pdf P. 27:

"For area within minimum APZ area:

67 Existing trees

37 Proposed trees

For area outside of minimum APZ area:

22 Existing trees

106 Proposed trees"

SOCIAL IMPACT ASSESSMENT REPORT - SSD-80018208 p. 81 "No net-loss of trees"

Therefore instead of simply admitting the obvious, that the clearance of a forest, wetland and more than 509 trees has a negative impact on biodiversity and the environment, the developer simply LIES to both the public and the NSW Government that their development instead somehow increases tree cover and biodiversity, simply because they said so and nobody will think to check! This repugnant attitude of the developer and their assumption that all residents of the area are complete idiots is even more offensive than proposing a destructive development and then simply admitting it.

Not only is this 'summary' (EIS Appendix 28 - Social Impact Assessment.pdf p. 6, "Table 1: Development Proposal Summary") itself intentionally misleading, including statements that are blatantly untrue such as "No net loss of trees" [sic], and others that conflict, such as the building here claimed to be "48m" but elsewhere confirmed to be "greater than 50m" (all in a zone with maximum permitted height 30m), but the supposed 'survey' of only 4-5 people was of even more intentional misleading of the general public, as further detailed shortly. It is likely similar inaccurate information was provided in EIS Appendix 26 - ACHAR (Redacted) copy.pdf for the supposed consultation of Aboriginal people, in spite of the 2+ Aboriginal Heritage Sites less than 20m from the development boundary, and many more which will be disrupted even on the other side of the Lane Cove River from the unnatural view of the lit-up data centre reflected in even the river water 24 hours a day.

As this report EIS Appendix 28 - Social Impact Assessment.pdf confirms, the developer conducted an intentionally useless and misleading survey from which they received only four responses. "The survey generated only four (4) responses from over 1200 Newsletters distributed through the local business and residential areas (refer Appendix B)." (p. 42). With such a poor response rate, it is almost as if the developer is TRYING to make sure the community is not 'consulted'. In spite of this, the so-called "Social Impact Assessment" concludes, on the basis of FOUR responses, that "there is little opposition to the proposal" (p. 42). The developer further lies about the results, such as that "One respondent expressed a concern around chemical storage and noise pollution from the resulting Data centre" but then claims this is not of significance because 'it is the opinion of only one person', their survey itself being of only four people. It seems that 3/4 respondents wanted "preservation of greenspaces" (p. 43) but this stated desire is ignored of course in the subsequent proposal to clear most the remaining forest from the site. The developer regardless concludes that all 4 respondents support their project anyway, when clearly they do not since the actual proposed development does not correspond with the statements the respondents were giving their opinions about.

Thus the findings are only thought representative when it is statements the developer wants to hear in straightforward confirmation bias. The developer intentionally did not consult the local community, but instead misrepresents this as a lack of opposition to the specific project.

" 4.3 RESPONSE TO ENGAGEMENT

Overall, the community interest in providing feedback on the proposal was low, with fewer than five Social Impact Community Survey responses made following community Newsletters and direct communication with two of the ten local community/interest groups. The limited responses

to community engagement including direct approaches and the survey suggest a low level of concern relating to the proposal and key themes relating to natural environmental, design of the development being key concerns."

In fact, this represents that the developer has not only ensured that those who were interested did not hear about the development at all, but any who did hear about it were intentionally deceived as to the nature of the development. For example (EIS Appendix 28 - Social Impact Assessment.pdf P. 44 : "Wild walks:

- Doesn’t see any negative impacts on walking trail "

It is unclear which 'walking trail' is even being considered here, but the proposed development is creating EXTREME changes to the current walking track on the site stretching from Richardson Place entry, that will be replaced with a road and concrete path past the electrical substation, and almost the entire forest it currently passes through will also be cleared, so clearly this respondent didn't even know what the proposed development was when they gave this response. It seems likely the developer intentionally sought out 5 people who would claim their project has no impact on them, since it is nowhere near them to start with. "Wild walks", it turns out, is not a 'community' organisation AT ALL, it is a website wildwalks.com showing bushwalks found Australia wide, and whoever responded to the developer's request probably doesn't even live in NSW, let alone Macquarie Park. Thus the 'community' has not been consulted at all.

Thus not only have only about 5 people been consulted about the project, at least one of them living elsewhere in Australia and probably never have even been to Macquarie Park, but in all consultations, the respondents have been fed misinformation and unaware of what the new proposal for the site is to start with.

As mentioned earlier, a completely different development ("Modified Determination No. 1395/1999, dated 11 September 2005") was approved in 2005 MORE THAN 20 YEARS AGO and an excavation of the front half of the site was done in 2009, leaving a hole in the ground, and many people would be fine with the assumed idea of a developer putting an ordinary <30m office building only in the front part of the site that is currently a recessed hole in the ground. Since the developer intentionally did not provide further details, instead only providing empty intentionally misleading marketing slogans about its project, most people would have simply assumed a building would be put in the existing hole in the ground, and would be unaware that most of the remaining natural vegetation outside this 2009 hole only taking up less than half of the site, is going to be cleared, AND that an illegal 50.93m+ high monstrosity, power substation, diesel generator and dangerous diesel fuel storage creating extreme fire risk, pollution and heat island effect is being put there instead. Since the developer's site borders the Lane Cove National Park, many people would have also incorrectly assumed the forest was inside the national park, when this is not true at all and it will instead be destroyed.

As stated earlier, the claim that the development will result in a "Positive Impact on Biodiversity" [sic] is blatantly FALSE along with its blatantly untrue claim that it will result in an "INCREASE" of trees in either canopy cover or number by clearing '509'+ mature trees and then only planting '133' plants. As the EIS Appendix 15 - BDAR.pdf claims, the negative impact on "biodiversity" even from just the proposed clearing of the site for construction includes but is not limited to:

"Impacts on Biodiversity Values

The Projects development footprint proposes to remove 1.33 hectares of native vegetation on the Subject Land, of which 1.2 hectares is PCT 3592 (vegetation zones; 3592_Regrowth 0.58 hectares and 3592_ModGood 0.62 hectares) and 0.13 hectares of PCT vegetation zone 3967_Regrowth."

Thus it is not even the mere removal of trees, but established old-growth forest in "good to moderate condition" including a functioning ecosystem and tree hollows, shrubs, caves, an entire rock ridge, soils etc. as well as regrowth of more than 15 years that is also valuable habitat for wildlife especially in proximity to the established forest and adjacent to the Lane Cove National Park. All of which is going to be removed. The removal of the wetland also suggests still further impending stormwater and sewage and erosion problems to be caused by the site, and the removal of the forest and the rock ridge will create still further erosion. Only a tiny area in the extreme south-west of the site is not proposed for clearance, although even this will probably not survive the actual construction process intact let alone the site's subsequent operation, and is not retained out of concern for the environment but rather that it is too steep and dangerous to touch anyway. The "Biodiversity Development Assessment Report" makes various recommendations (e.g. p. 51/66-59/74 note that the printed page numbers do not match the PDF), including but not limited to claiming that somebody should keep looking for endangered shrubs and carefully pick up and manually move all hollow logs etc. into the tiny area not intended for destruction,

("2c. Relocating habitat features (eg fallen timber, hollow logs) from the development or clearing site, to adjacent retained vegetation" p. 54/69)

but there is no confirmation that ANY of these will actually be followed during the construction or operation process, especially when the construction workers have no training or interest in such activities. In reality the entire site will be razed and ground up as seen in the 'clearance' of every other construction site in Sydney, regardless of the presence of wildlife, endangered shrubs, hollows, hollow logs et al. As for the tiny area of vegetation proposed to be retained at the extreme south-west of the site, even after construction is finished and operation of the complex commences, it too will now be inhospitable for wildlife and natural ecosystems, due to the 24 hours a day light, heat, noise, vibration, pollution, rubbish, increased stormwater and flooding, erosion, danger from the electrical substation, and other disturbances. The ACTUAL amount of destroyed habitat is thus far greater than the "1.33 ha" admitted by the EIS Appendix 15 - BDAR.pdf since a far larger surrounding area will become permanently inhospitable to wildlife and natural ecosystems from the negative impacts of the 50.98m+ high data centre's ongoing and indefinite operation 24 hours a day 7 days a week 365 days a year. These impacts are so extensive that they potentially extend to the other side of the Lane Cove River as well, due to the development's elevated position, more than 50m height and the fact that any unnatural lighting reflect into the Lane Cove River itself 24 hours a day. Thus biodiversity, Aboriginal Heritage Sites and the enjoyment by humans is destroyed not only on the site itself and in the adjacent section of Lane Cove National Park, but even in the reserves on the other side of the Lane Cove River such as Mobray Park and the other side of Lane Cove National Park as well. Add to this the catastrophic fire risk posed by the complex itself and any fires it creates or greatly exacerbates, and the net LOSS to biodiversity is generated not only from the clearance of the forest itself, but to a vast surrounding area in a permanent basis during the data centre's proposed operation. It is impossible to quantify such an extreme and extensive negative effect on biodiversity

created both by the construction but also ongoing and indefinite 24/7/365 operation of this proposed data centre, but it is obvious that in spite of the developer blatantly pretending otherwise, it has an extreme and unacceptable NEGATIVE impact on biodiversity that extends far beyond even the boundaries of the land owned by the developer but to both sides of the Lane Cove River including but not limited to Lane Cove National Park, Mobray Park, Lane Cove, North Ryde, Macquarie Park, and even further, and this data centre should NOT be approved at this location under any circumstance!

INTENTIONALLY MISLEADING 'SOCIAL IMPACT REPORT' SHOULD BE REJECTED AND OFFICIAL CONSULTATION PERIOD EXTENDED

Not only does this four person survey in EIS Appendix 28 - Social Impact Assessment.pdf not include any actual current residents of Ryde/Macquarie Park/Lane Cove, it also includes none of the thousands of proposed residents that are intended to be moved into Macquarie Park in its recent rezoning to High Density Residential areas. This is particularly significant in that they intentionally surveyed an area which has been REZONED as residential but most of the residents are not even there yet, and the other businesses are being moved out anyway. The survey itself, however, and all other promotional materials by the developer, have been INTENTIONALLY misleading, consisting of empty marketing slogans with blatant untruths such as "I would like to improve the quality of the building environment" or "I would like to promote sustainable development" or "I would like two new roads built in Macquarie Park (without any mention as to what context these would occur).

The 'social impact survey' is a typical example of a pre-biased marketing campaign, where (as shown on p. 43) the developer makes up some positive sounding statements, asks whether the respondents think these statements sound desirable, and then subsequently openly lies that the development will provide these and thus instead of the response indicating support for an empty marketing statement, incorrectly reframe the response as instead support for this specific development when this is not the case. The survey is not getting accurate information and this is intentional. It is, as just, mentioned, the invention of disconnected positive statements that are not actually true of the proposed development, most people will "agree' that these positive statements sound desirable, and then the developer lies and claims that support for this irrelevant marketing slogans instead are support for the developer's specific project, which will in actuality provide none of these (or, in the case of the two roads, could and would have been provided anyway).

So for example the pre-written statement:

"I would like to improve the quality of the built environment in Macquarie Park"

The survey then asks if the respondent supports this isolated statement.

If someone saw this innocuous sounding statement, they would probably say, yes I would like this. Then the developer misrepresents the survey, and lies that this means the four respondents instead support this specific inappropriate development, which arguably does NOT "improve the built environment" of Macquarie Park at all. It is the same for every other isolated, positive sounding statement in the fake 'social impact' survey. Obviously the respondents will say that yes they approve of the provided empty isolated statements like "I would like to promote sustainable development" and "I would like to provide land uses that meet the needs of the local community"

and then the developer LIES and claims that this is instead the four survey respondents indicating support for the specific inappropriate proposed development.

Although some of the statements in the fake survey/promotional materials are unquantifiable, some of the statements make direct numeric claims that can be disproven as matters of fact. These include, but are not limited to, the environmental impacts of this inappropriate development. The developer has repeatedly openly lied in its promotional materials and supposed surveys about this development, making blatantly untrue claims like "there will be No net-loss of trees" and "No negative impact on biodiversity", not only to the public but even to the "NSW Department of Planning, Housing and Infrastructure" in SEARs Request - Julius Avenue Data Centre.pdf on p. 20 and probably elsewhere as well. There are, it seems, no laws against lying when trying to get a development ticked off and mindlessly approved by the NSW State Government.

Thus the submission period for the general public should be extended, as requested by Mayor of Ryde Council. After this extended submission period, the proposal should be rejected entirely.

IMPUNITY OF CLAIMING THAT AN UNRELATED COMPLETELY DIFFERENT PROPOSAL FROM 2005 HAS ALREADY GIVEN THEM PERMISSION TO REMOVE ALL VEGETATION FROM THE SITE

The developer (e.g. SEARs Request - Julius Avenue Data Centre.pdf) demanded that the proposal be approved on the basis of a previous development approval for the site in 2005: MORE THAN 20 YEARS AGO! In spite of the fact that the 2005 proposal ("Modified Determination No. 1395/1999, dated 11 September 2005") bore no resemblance whatsoever to the 2025 proposal, the developer has claimed that the fact they could, hypothetically speaking, clear some vegetation from the site for the 2005 proposal Modified Determination No. 1395/1999, has already given them permission to clear ALL vegetation from the site for the 2025 proposal, in spite of more than 20 years passing and the proposals being completely different facilities. "Given the significant vegetation clearing already approved on the Site as part of Modified Determination No. 1395/1999 ..." (SEARs Request - Julius Avenue Data Centre.pdf p. 9). Permission for anything in the 2005 proposal is thus incorrectly assumed to already be granted automatically. This means that the developer has misrepresented the proposal in this aspect as well, since, for example, if a tree was 'approved' to be cleared in 2005, they assume they do not have to request permission to do so again, and even if a tree really was cleared in 2009 for the 2005 proposal and a different tree is still there, nobody will know or care if it is one from the '2005' proposal or not.

DEVELOPER REPEATEDLY LIES THAT THE PROPOSAL WILL SOMEHOW LEAD TO "providing double the existing canopy coverage" COMPARED TO THE SITE'S PRESENT CONDITION WHEN THIS IS IMPOSSIBLE AND AN EMPTY, LYING DECEPTION.

The nonsensical claims the developer makes seem to be related to the never built 2005 proposal, since this is the only explanation for such statements other than outright deception. So, for example, the constantly repeated statement that there is "no net-loss of tree canopy coverage from lot/s". This marketing slogan is also repeated in EIS - Julius Avenue Data Centre 240625.pdf.

EIS Appendix 15 - BDAR.pdf has elsewhere confirmed that a huge amount of forest ecosystem is going to be completely removed from the site.

"Impacts on Biodiversity Values

The Projects development footprint proposes to remove 1.33 hectares of native vegetation on the Subject Land, of which 1.2 hectares is PCT 3592 (vegetation zones; 3592_Regrowth 0.58 hectares and 3592_ModGood 0.62 hectares) and 0.13 hectares of PCT vegetation zone 3967_Regrowth."

This forest ecosystem contains so many trees and plants that the exact amount that will be destroyed is uncountable, but elsewhere (EIS Appendix 12 - Landscape Design Report.pdf P. 25; p. 27) admits that a minimum of "509" mature trees will be removed from the site. EIS - Julius Avenue Data Centre 240625.pdf confirms that from this area, only "38" trees will be attempted to be retained and then "143" plants subsequently planted in total in the entire development site. Yet EIS - Julius Avenue Data Centre 240625.pdf on p. 81/94 then also makes the thoroughly nonsensical claim that this somehow leads to an INCREASE of tree canopy coverage on the site! "The Landscape design of the Julius Avenue Data Centre responds to the growing impacts of the urban heat island effect by providing double the existing canopy coverage and the minimising of unshaded hard surfaces. " So the developer lies and claims that the site now has "double" the tree canopy cover after the proposed development, compared to before. When it so obviously does not. I will repeat the numeric quantities provided elsewhere by the developer themselves:

"509+" mature trees proposed to be removed. Only "133" replacement plants to be planted. (EIS Appendix 12 - Landscape Design Report.pdf P. 25; p. 27)

"38" trees retained and the rest of them cleared. 38 trees out of more than 509 removed, most of which were part of a forest of both trees and shrubs. This quotes a different figure, but equally small, that "143" plants will then be replanted. (EIS - Julius Avenue Data Centre 240625.pdf p. 127/140)

After the project, a maximum of 133+38 or 143+38 plants will thus remain. In addition to this, a tiny corner of natural vegetation will be retained in the south-west corner of the site (the exact dimensions of this do not seem to be disclosed but it is marked on the maps). But this is NOT any sort of increase in vegetation or canopy cover, since it is just the tiny patch of natural vegetation that has been there before the development ever started, and so retaining it the same as it has been all along is not any sort of increase in trees or canopy cover, let alone it 'doubling'. All that has happened is that at least "509" mature trees and at least "1.33 hectares' of native forest that was still there in 2025, will be completely removed. The 133 or 143 plants that will be replanted not only do not compensate for the trees and forest lost, they are even less a "double" of the tree canopy prior to the development. The report EIS - Julius Avenue Data Centre 240625.pdf is simply lying to the reader. The declaration "does not contain information that is false or misleading" is untrue. It is possible whoever wrote EIS - Julius Avenue Data Centre 240625.pdf was also fed misinformation by the developer and got confused and made an honest mistake, but it seems this laxity in not seeing whether the figures could possibly correspond to each other is intentional.

A total of 143 new plants and 38 retained trees, when a minimum of 509+ trees were removed. This is a loss of at least 328 trees.

Yet not only does the developer repeatedly and incorrectly claim there is "no net loss of trees". By EIS - Julius Avenue Data Centre 240625.pdf the claim has become even more ridiculous. After a LOSS of at least 328 trees compared to before, the developer LIES and quite literally claims the development site will have DOUBLE the tree canopy it did before the development (as in, its state

now, assuming the develop has not gone and cleared it since the EIS Appendix 15 - BDAR.pdf in early 2025). "EIS - Julius Avenue Data Centre 240625.pdf on p. p. 81/94 "The Landscape design of the Julius Avenue Data Centre responds to the growing impacts of the urban heat island effect by providing double the existing canopy coverage and the minimising of unshaded hard surfaces." It can be seen it is impossible it will ever have 'double' the tree coverage even if more than 143 plants were replanted, since the proposed buildings, roads, concrete and electrical substation that will then be taking up most of the site that was formerly forest make this impossible. The developer in all its reports therefore just makes up statements and claims out of thin air and lies with impunity. In fact, I believe that all that occurs is after their 4 person survey that found out 3/4 people surveyed were worried about the loss of native vegetation, they decided that a better marketing slogan than simply pretending that their project has 'no net loss of trees', is to amend it to an even greater marketing slogan, lying that it actually 'DOUBLES the tree canopy cover' so the environmentally concerned residents will be even better deceived by their unwanted development, and unable to oppose it until it is too late.

PRE-EMPTIVE REFUSAL OF DEVELOPER TO PROVIDE REPLACEMENT PLANTING ELSEWHERE EITHER

See "6.1.7.2 Tree replacement' in EIS - Julius Avenue Data Centre 240625.pdf p. 127/140.

"It is understood that amendments to the tree provisions contained within Part 9.5 of RDCP 2014 have undergone public exhibition. The draft DCP prescribes a replacement tree planting rate of 3:1, however this is inconsistent with the Macquarie Park Design Guide, and the controls of the Macquarie Park Design Guide prevails to the extent of any inconsistency. "

As the developer themselves admit, Ryde Council is supposed to require replacement tree plantings at a 3:1 ratio (the planting may be elsewhere in Ryde) a rule that other developers are expected to comply with. Developer contributions then pay for new street and park trees. This rule is even more important since most newly planted trees don't survive anyway, (often due to vandalism by developers) so planting 3 means it is more likely one replacement will survive to reach tree height. However, in spite of openly lying and deceiving the public that they have 'no net loss of trees' and 'doubling of tree canopy', the developer has pre-emptively stated their REFUSAL to comply with the law Ryde council expects other developers to comply with. "Laws don't apply to me" is the bad attitude of this developer, while at the same time they lie with impunity, pretending that there is "no net loss of trees" and even a "doubling" of tree canopy, while REFUSING to comply with the bare minimum contribution to replacement plantings expected by law in Ryde Council. Ryde Council is regardless expected to cope with the severe drain to infrastructure that will be caused by this parasite.

THREATS TO 7+ ENDANGERED SPECIES AND ALL OTHER WILDLIFE IN THE AREA, INCLUDING OUTSIDE SITE BOUNDARIES IN LANE COVE NATIONAL PARK AND SURROUNDS

As admitted by the EIS Appendix 15 - BDAR.pdf subsequently commissioned by the developer, The endangered shrub Darwinia biflora (growing maximum 80cm high and not included in countings of 'trees') has previously been recorded from the site, and the following threatened species:

"considered assumed present on the Subject Land":

Large-eared Pied Bat Chalinolobus dwyeri,

Little Bent-winged Bat Miniopterus australis,

Large Bent-winged Bat Miniopterus orianae oceanensis,

[plants]

Deyeuxia appressa,

Hibbertia spanantha ,

Rhizanthella slateri,

[Darwinia biflora as stated earlier].

It is also habitat for a long list of other threatened species who can no longer use the site after its proposed destruction.

The location and nature of this development means its effects extent to a vast area outside the site boundaries. This is due to development's immense height of more than 50.93m, the fact that it is brightly lit up 24 hours a day and reflects sunlight in the daytime blinding all onlookers, and its elevated position on the edge of a cliff before a steep dropoff to the Lane Cove River. The river itself reflects the building at all times of the day or night, so even when people look out at the water instead, all they see is the reflection of this inappropriate data centre. As offensive as the data centre is to all human onlookers 24 hours a day even on the other side of the Lane Cove River, it is even more harmful to wildlife and natural ecosystems. In spite of this, the consideration of the grotesque negative impacts to wildlife and ecosystems even outside the site boundaries from its horrific levels of unnatural light, heat, noise, vibration, pollution, fog/smog, increased fire and lightning risk, etc., including in the adjacent Lane Cove National Park, were not considered at any point. This was a mistake. A development of this kind should simply NOT be at this particular location!

UNACCEPTABLE HARMFUL IMPACTS OF PROPOSED LIGHTING ON ECOLOGICAL COMMUNITY, NATIONAL PARK AND ENDANGERED SPECIES

The harm to the forest and river ecosystems extends beyond even just the forest immediately cleared by the development, and to the entire surrounding area, including but not limited to Lane Cove River National Park, Mobray Park and both sides of the Lane Cove River. One reason for this is the extreme and excessive amount of artificial lighting provided 24 hours a day by this 50m+ high blatantly visible cliff-top complex. The proposed development has as many artificial lights as possible, even including additional completely unnecessary "decorative lighting" [sic] along almost the entire west and south of the complex to create as much excess light pollution as possible.

The remnant natural ecosystems, as well as any humans in the area, will be negatively impacted by the proposed lighting in three categories:

1. - The ecosystem will be harmed by the extreme number and magnitude of artificial lighting in the immediately adjacent area, creating both light and heat pollution impacts.

2. - The ecosystem will be harmed by light spill DIRECTLY. This includes reflections on the Lane Cove River which means the impacts of any light spill extent to a vast area 24 hours a day. this location on top of a cliff before the steep dropoff to the Lane Cove River as well as the reflection in the river itself means that the effects of the 24 hours a day lighting creates as much light pollution as possible to as vast an area as possible. During the day, people and animals will be blinded and harmed by sunlight reflecting off the building as well.

3. - The parts of the ecosystems not receiving light pollution directly will still be harmed due to the biodiversity loss created by the lights as species no longer use or pollinate the area.

No consideration has been made about the harm to ecosystems or humans by light pollution. Indeed as much light pollution as possible is INTENTIONALLY crated by the complex, which even has the offensive and unnecessary addition of "decorative lighting" [sic] proposed along most of the Western and Southern edge of the site. Since data centres must by necessity run 24 hours a day, all the lights of the complex are NEVER turned off. This 24 hour a day light pollution causes extreme harm to wildlife and ecosystems, and permanently destroys any capacity for humans to enjoy the natural environment of Lane Cove National Park, Mobray Park and other formerly natural areas.

HARMFUL EFFECTS TO NATURAL ECOSYSTEMS FROM ARTIFICIAL LIGHTING

The harm to the natural environment by artificial light pollution is well documented.

Such as in:

Irwin, A. (2018) The dark side of light: how artificial lighting is harming the natural world. Nature 553, 268-270 (2018) doi: https://doi.org/10.1038/d41586-018-00665-7

https://www.nature.com/articles/d41586-018-00665-7/

and the edited book:

"Rich, C., & Longcore, T. (2006). Ecological Consequences of Artificial Night Lighting. Island Press, Washington."

https://www.nature.com/articles/d41586-018-00665-7/

provides a useful summary of science in the area of the damaging effects of artificial lighting on natural ecosystems.

- The article confirms that different sorts of light are even more damaging to animals, plants and ecosystems and that the LED lights with their broad spectrum of white light that are more recently used are even more disruptive to natural processes than other lights.

"The widespread installation of LIGHT EMITTING DIODES (LEDS), which are growing in popularity because they are more energy efficient than other bulbs [..] tend to emit a BROAD-SPECTRUM WHITE LIGHT THAT INCLUDES MOST OF THE FREQUENCIES IMPORTANT TO THE NATURAL WORLD. The trend has had profound impacts on some species."

All lights, even including far weaker streetlights, have been discovered by researchers to have a profound impact on natural ecosystems: plants, animals, insects, and the ecosystem as a whole due to the reduction in pollinators and food sources.

The negative effect of the lights will be compounded by the additonal extreme amount of heat generated by the complex. Plants and animals associate heat with the sun: both it being daytime, or it being summer. The plants and animals will become disrupted from their natural seasonal or day/night cycles by the constant light and heat generated by this artificial complex.

Thus the complex will cause two separate yet related effects; an increase in light, and an increase in heat generated and a change in the micro-climate. This increase in heat will also have a catastrophic effect on the ecosystem/s. The lights' emissions can also be guaranteed to emit signals not perceived by humans but disturbing to wildlife. And, in a separate but also exacerbating issue, the incredible amount of noise, vibration and magnetic fields ALSO emitted by the artificial complex will further disrupt and disturb all wildlife.

https://www.nature.com/articles/d41586-018-00665-7/ reviews some studies of the effect of artificial lights on natural ecosystems, the same impacts that can be predicted to occur to these nearby ecological communities.

ARTIFICIAL LIGHTING IS LETHAL TO INSECTS, AND DESTRUCTION OF INSECTS THREATENS ENTIRE ECOSYSTEM

- Artificial lights are lethal to insects which are "vital food sources and pollinators in many ecosystems. An estimate of the effects of street lamps in Germany [that are much less bright than the lighting in proposed development] suggested that the light could wipe out more than 60 billion insects over a single summer. Some insects fly straight into lamps and sizzle; some collapse after circling them for hours" (Irwin, 2018).

Therefore the lighting in the proposed development will disturb and destroy insects, attract them out of the remaining natural vegetation and kill them, leading to a loss of biodiversity, pollinators and food sources. Ecosystem will be degraded and collapse.

The fact that lights attract insects, and that some insect-eating wildlife has learned to tolerate and capture insects in the artifical lighting provided by humans, means that further risk will be posed by this complex, as obviously both the data centre and the electrical substation are not compatible with wildlife. Insects will have to be poisoned, and any bats or birds that come into the area to try to eat insects will be poisoned, electrocuted, or crash into a window of the 50m+ high complex and die.

- ARTIFICIAL LIGHTING IS LETHAL TO AQUATIC INSECTS WHO ARE LURED OUT OF THEIR HABITATS AND KILLED, AND DESTRUCTION OF INSECTS THREATENS ENTIRE ECOSYSTEM, INCLUDING ADJACENT ECOSYSTEMS NOT IN LIGHTED AREAS.

- The negative effects of artificial light pollution on aquatic insects has been studied specifically.

A study of aquatic insects (as described in Irwin, (2018)) found they were lured out of their habitats by the artificial light and died, either from exhausting themselves or from being eaten.

"Street lamps erected near water-filled ditches lure aquatic insects out of the water [..] The insects flock to the lamps, exhaust themselves and become food for nearby predators. Meanwhile, the [adjacent ecosystem], which might otherwise have received insect visits, is deprived of an important source of food" (Irwin, 2018)

Since insects are integral to the entire ecosystem both as pollinators and as food sources, the entire ecosystem will be degraded from this biodiversity loss. There will probably also be an increase in the few pests able to tolerate artificial human-built conditions such as mosquitoes, due to the reduction of competitors or predators.

"[There is] 'evidence of a strong, bottom-up effect of exposure to artificial light,' says Gaston. [their research] reveals further effects, cascading onto the predators in the systems."

Another experiment, "has shown that these cascade effects can spill over into neighbouring ecosystems. Street lamps erected near water-filled ditches lure aquatic insects out of the water, says Franz Hölker, an ecohydrologist at the Leibniz Institute of Freshwater Ecology and Inland Fisheries in Berlin. The insects flock to the lamps, exhaust themselves and become food for nearby predators.

Meanwhile, the hinterland [adjacent ecosystem], which might otherwise have received insect visits, is deprived of an important source of food, he says.

Studies such as these, which lay such relationships bare in well-controlled, small-scale studies, mean that 'those impacts are more likely to be taken seriously in the field and by regulators considering impacts from lighting', says Longcore." (Irwin, 2018).

- DIRECT NEGATIVE EFFECTS OF ARTIFICIAL LIGHTING ON PLANTS

Although plants are negatively affected indirectly from lights when their pollinators no longer use the area, the plants are negatively affected directly by artificial lighting as well, since they will incorrectly interpret the artificial lighting as sunlight and thus day length and time of year. (Rich & Longcore, 2006).

As mentioned, this complex will generate massive amounts of heat as well, so the confusing effects of artificial light will be exacerbated by the increased amount of heat, meaning that plants and animals will be even more likely to confuse the complex with the endless onset of daytime and summer.

- ARTIFICIAL LIGHTING IS INTERPRETED AS SUNLIGHT AND DAY LENGTH AND MAKES PLANTS FLOWER AT WRONG TIME OF YEAR, THREATENING THEIR SURVIVAL

- Artificial lighting disrupts plants' timing of flowering.

Disruption to plants' timing of flowering by artificial light is confirmed by the edited book "Rich, C., & Longcore, T. (2006). Ecological Consequences of Artificial Night Lighting. Island Press, Washington."

This is because plants usually confuse artificial lighting with sunlight and an increase in day length, and therefore what season it is. Since the building is over 50m high and is also at the highest point on the edge of a cliff before the steep dropoff into the Lane Cove River will be above the height of most of the plants even the trees and definitely confused as sunlight by all species even trees. Plants both near and far will thus be confused by the excessive artificial lighting overhead, and even reflected off the Lane Cove River itself 24 hours a day 365 days a year.

The plant uses day length as a guide to what time of year it thinks it is and when to flower. Since the length of daylight is shorter in winter and longer in summer, the plant may incorrectly detect that winter has ended before it has due to artificial lighting and start flowing at the 'wrong' time of year.

If plants flower in the 'wrong' season, it means that their pollinators will not be available, or IF it manages to successfully reproduce, the weather conditions at that time of year will not be suitable for its offspring who will die.

Natural ecosystems worldwide are already being impacted by changed climate conditions due to global warming. The increased stress from artificial lighting as well means that the ecosystem is even more likely to collapse from not being able to reproduce in favourable weather conditions.

"A study in the United Kingdom over 13-years timing of bud opening in trees, found that artificial lighting was linked with trees bursting their buds on average more than a week earlier — a magnitude similar to that predicted for 2 °C of global warming." Since this is an average, it means that some species had their flowering timing disrupted by far more than a week.

(Irwin, 2018).

"A study of soya-bean farms in Illinois found that the light from adjacent roads and passing cars could be delaying the maturation of crops by up to seven weeks, as well as reducing yield." (Irwin, 2018)

If the plant flowers at the 'wrong' time of year due to the artificial lights, not only may weather conditions be inhospitable to the survival of its offspring but the animals that pollinate it not have arrived yet either, and therefore the plant will fail to reproduce at all. As well as some pollinating birds migrating, insects and spiders may not have hatched yet or be in hibernation. If the plant does manage to reproduce, its seedlings may then die due to unfavourable weather conditions or pests that eat it that are more abundant at certain times of year. So, for example, many Australian plant species start flowering in Winter in around beginning of August since they want their seedlings established BEFORE summer, and other plants species worldwide and in Australia flower in Spring. If the plant is confused by the artificial lights and starts flowering too early, such as the start of winter, the seedlings will not survive or the flowers not be pollinated at all.

- The change in the micro-climate from the heat generated by the complex itself and also the lighting may make it too inhospitable for many species to survive at all especially in summer, but it may also lead plants and animals to incorrectly detect that it is now a different, hotter time of year. The now-permanent heat generation by this artificial complex exacerbates the problems already

caused by the lighting, as the former cooler conditions associated with winter never again occur. Many native plants may no longer survive at all, and some species may experience an explosion of numbers, probably a select few (and often introduced) insect pests and weeds that are promoted by the artificial newly-heated microclimate. These will eat or otherwise kill off the few remaining natural plants in the area. The artificial heat combined with humidity could also ensure the increase in other pathologies such as fungal diseases to kill off the remaining natural plants. The EIS claims that the heat will also be emitted out of pipes creating large clouds of condensation near the complex, which cause an unnatural fog and smog, even when there is no fog elsewhere. It will become even more toxic when it mixes with pollution from the diesel generators or from elsewhere. Humans, animals and plants will all be harmed.

- ARTIFICIAL LIGHT POLLUTION HAS NEGATIVE EFFECTS ON BIRDS AND BATS. NOT ONLY ON NOCTURNAL BIRDS BUT DAYTIME BIRDS AS WELL.

- Researchers have "found physiological evidence of the detrimental effects of light pollution on the health of wild animals. Songbirds roosting around the white light were restless through the night, slept less and had metabolic changes that could indicate poorer health".

"Several urban studies had found that artificial light at night triggers [daytime] songbirds to sing earlier in the day." [i.e. wake up earlier].

- Artificial illumination affects bats and many "have lost habitat and have disappeared from some places."

This would include but is not limited to the endangered species of bats that live in the area:

Large-eared Pied Bat Chalinolobus dwyeri

Little Bent-winged Bat Miniopterus australis

Large Bent-winged Bat Miniopterus orianae oceanensis

(EIS Appendix 15 - BDAR.pdf p. 5)

The impact on the endangered bat species is further exacerbated by the proposed complete removal of a rock shelf and 2+ caves from the site.

- ARTIFICIAL LIGHTING NEGATIVELY AFFECTS ADJACENT ECOSYSTEMS EVEN IF THESE AREAS THEMSELVES ARE NOT LIT UP. THE NEGATIVE IMPACTS THE LIGHTING WILL HAVE ON THE ADJACENT NATURAL AREAS WILL BE IMMENSE.

Ecosystems are always reliant on insects and other animals coming in from adjacent areas, especially in a tiny fragment. So, for example, on pollinators to arrive when a plant flowers.

Therefore even if the lighting is not within the remaining forest or river area itself, lighting up the adjacent area harms the ecosystem in two ways:

- Insects will be lured out of the natural area by the lights and kill themselves.

- Since the natural areas in the vicinity are already fragmented, many animals do not live in it permanently but travel between habitat fragments. Once the development is built and operating, the animals (such as insects) will now be killed in the adjacent floodlit areas, or (in the case of birds, bats etc.) simply start avoiding the area entirely. Since the ecosystem no longer has these species it will degrade and in the smaller areas, collapse.

- NEGATIVE EFFECTS OF LIGHT POLLUTION AFFECT DAYTIME SPECIES IN ECOSYSTEM AS WELL. THIS IS DUE TO THE REDUCTION OF INSECTS AS FOOD SOURCES OR POLLINATORS, SINCE THE INSECTS DECLINE FROM LIGHT POLLUTION. WHEN INSECTS NO LONGER POLLINATE FLOWERS, FLOWING PLANTS CANNOT REPRODUCE AND DECLINE AS WELL.

"'Cascade effects' [mean] the influences of light on one species have knock-on effects on the ecosystem."

As described in Irwin, (2018), a study on boxes of grassland given 54 different lighting conditions found that white and amber light suppressed flowering altogether in some plant species. Numbers of some insects fell, supposedly because the flowers they ate were also less abundant due tot he artificial lighting. Since there were less insects they were ALSO unable to pollinate ADJACENT AREAS OUTSIDE THE ARTIFICIAL LIGHTING.

Therefore the negative effects of artificial lighting are NOT restricted to the areas directly lit, since the reduction of insects and other animals due to the artificial lighting mean they can no longer fly or travel in from adjacent areas, even if these ecosystems themselves are not lit up.

- "Artificial light can also have impacts on ecosystem services — the benefits that ecosystems provide to humans. A study published in Nature last year found that illuminating a set of Swiss meadows STOPPED NOCTURNAL INSECTS POLLINATING PLANTS [..] found that INSECT VISITS TO THE PLANTS DROPPED BY NEARLY TWO-THIRDS UNDER ARTIFICIAL LIGHT and that daytime pollination couldn't compensate: the plants produced 13% less fruit. Knop's team forecast that these changes had the potential to cascade to the daytime pollinator community by REDUCING THE AMOUNT OF FOOD AVAILABLE [to daytime animals as well]. 'This is a very important study, which clearly demonstrates that

artificial light at night is a threat to pollination,' says Hölker" (Irwin, 2018).

VULNERABLE SPECIES Darwinia biflora ON SITE

An endangered species of shrub (Darwinia biflora) growing "to 80cm high" has also been recorded from this site, as well as other endangered shrubs assumed to exist there and these endangered species of shrub being removed are not, of course, included in the number of trees being removed, since shrubs do not meet the height criteria of a 'tree'. This shrub Darwinia biflora is particularly endangered since its natural range was from a small area of Sydney including the Ryde area ("Ku-ring-gai, Hornsby, Baulkham Hills and Ryde local government areas"), most examples of which have

been similarly cleared for over-development, and so "biodiversity credit offsets" do nothing when there are no remaining fragments of habitat left to spend the supposed offsets on.

https://threatenedspecies.bionet.nsw.gov.au/PasSearchSpecies?speciesName=Darwinia+biflora&generalType=Shrubs

recommends the following conservation activities for Darwinia biflora, all of which are being ignored:

"Identify sites that are a high priority to protect."

This site is not being protected. It should be a high priority, given the proximately to the National Park and other mass vegetation clearance in Macquarie Park and elsewhere in its limited range.

"Negotiate with public authorities to increase legislative protection for high priority sites on public land."

Unfortunately this is not public land, although the developer has NOT offered to dedicate part of the site to the public/national park instead.

"Liaise with private landholders to protect sites on private land."

NSW Government should do this but is not.

"Threat and habitat management programs will be implemented by public authorities on public lands."

N/A. since it is unfortunately not public land

"Ensure easement maintenance activities will not affect survival of populations."

Most of the ecosystem will be destroyed during construction, although the small amount of vegetation that survives construction will then be destroyed by the ongoing operation and mismanagement by the private complex.

"Advice will be provided to consent and planning authorities so that informed environmental assessment and planning decisions can be made."

I am giving advice and the "consent and planning authorities" should reject this proposed development

"Investigate aspects of the ecology of the species."

N/A when it will be destroyed to start with. However, the changed conditions will probably mean that this and the other threatened species can no longer survive even in the tiny amount of proposed retained vegetation in the extreme south-west corner of the site.

"Identify and survey potential habitat."

The habitat wad identified, yet it is being permanently destroyed by this inappropriate development

"Encourage community involvement, particularly in the implementation of threat and habitat management programs and monitoring programs."

As part of the community, I encourage this threat of the proposed development to be rejected.

"Provide advice and assistance to private landholders, to identify actual and potential threats and negotiate the implementation of on-ground works to address threats."

This is not being done and the habitat is being intentionally and permanently destroyed

"DEC advised of any consents or approvals which affect species."

This will affect this and numerous other threatened species.

"Re-assess conservation status of species. Darwinia biflora"

The shrub was already Vulnerable, and the permanent removal of a site where it is confirmed recorded will threaten it further.

The permanent harm to the endangered bat species, and indeed all other forms of nocturnal and even daytime species by the abnormal level of 24/7/365 light, heat and noise and vibration generation by the proposed development is perhaps even more extensive. This includes but is not limited to, bats, owls, frogmouths, possums, insects, plants, and daytime animals and plants whose sleep and seasonal cycles will be disrupted by the excessive artificial light, heat, noise and vibration that affects far beyond the boundary of the actual development site. Even if someone is not looking at the building direction at all there is no escape, since this unnatural lighting will be reflected 24 hours a day by the Lane Cove River as well, so the only thing humans or animals ever see any more is this offensive inappropriate "data centre". The proposed development tries to exacerbate these negative impacts, by not only making the 24 hour a day lit-up complex more than 50m high, but even ensuring there is as much additional unnatural lighting as possible by lighting up the south and west side of the complex with thousands of additional, completely unnecessary "decorative lighting" [sic].

PROPOSED ELECTRICITY GENERATING WORKS ARE NOT PERMITTED IN E3 ZONE

"E3 zone pursuant to RLEP 2014" prohibits, among other things, "Electricity generating works;"

Yet as can be seen in the proposal, there is an electrical substation in this proposal, as well as a diesel generator and the dangerous fire-prone storage of "840kL 12 x 70kL tanks" of diesel fuel. ("Dangerous Goods 840kL diesel storage capacity (12 x 70kL tanks)") Thus there will be "Electricity generating works" in spite of it being prohibited in E3 zone. Data centres are also an "extractive industry" in spite of these also being prohibited.

DEVELOPMENT EXCEEDS MAXIMUM HEIGHT OF BUILDINGS, 50.93m vs 30m/45m 'for recreational buildings only'

The maximum permitted height of buildings is 30m, meanwhile this proposal exceeds this by more than 20m at 50.93+m. As confirmed by EIS - Julius Avenue Data Centre 240625.pdf p. 48:

"3.3.3.5 Building Height

The maximum height of the main data hall building in the centre of the Site is 50.93m,

which constitutes the mesh screening to the rooftop plant in the north-eastern corner of the building. [..] The Site is subject to a 30m base maximum building height development standard pursuant to Clause 4.3 of RLEP 2014 and an incentive maximum building height development standard of 45m pursuant

to Clause 7.7 of RLEP 2014.

The Proposal seeks a maximum building height of 50.93m, which exceeds the 45m incentive maximum building height development standard by 5.93m or 13.1%."

The report cites a 'bonus' height of 45m subject to conditions (the Macquarie Park Corridor Precinct Incentive Height of Buildings). However, at 50.93m, the development still exceeds the 'incentive' height of 45m by 5.93m+. I also argue that the development does NOT meet the criteria to be granted the 'bonus' height' of 45m. However at 50.93m+, it illegally exceeds the maximum 'incentive' height of 45m by 5.93m+ and should be rejected. The illegal extra height of the building has additional extreme negative impact when viewed from the other sides where the cliff then steeply drops off to the Lane Cove River below, so all that is seen from a vast surrounding area is the unnatural lit-up eyesore of this illegally 50.93m+ data centre. As well as being lit up 24 hours including all night every night, the proposed reflective metal finishes mean it will blind onlookers with reflected sunlight during the day as well. The extreme height of the building also exacerbates its other risks such as being hit by lightning, being the tallest object on the highest point before the steep dropoff.

This development is illegal even under the maximum "incentive height" of 45m. However it should not qualify for the Macquarie Park Corridor Precinct Incentive Height of Buildings anyway.

"only if the consent authority is satisfied that the development includes adequate provision for one or both of the following—

(a) recreation areas that are configured and located in a way that is appropriate for the recreational purposes of the Precinct,

(b) an access network that is configured and located in a way that will allow a suitable level of connectivity within the Precinct."

The proposed development dismally fails both these criteria.

a) The site is not and is not suitable as a 'recreational area'. It is an unpleasant expanse of bare concrete next to a private, noisy, heating, polluting, dangerous, data centre and diesel generator, as well as a dangerous electrical substation. Nobody will hang around next to such a complex for 'recreation' and if anyone loiters, they will surely be told to move on by security guards. In reality the grounds may be used by employees of the data centre and nobody else.

b) Including a concrete path along one edge of the complex does not count as "(b) an access network that is configured and located in a way that will allow a suitable level of connectivity

within the Precinct.". By contrast, it would be illegal to block access entirely to the existing roads and walking paths, and illegal to block access to the fire trail. The development has lead to a liability and decrease in the current level of 'connectivity' and does not deserve an 'incentive' height on this basis either, it thus dismally fails both criteria a) and b).

It should also be noted that there is effectively nowhere for pedestrians to go, since they are blocked by a steep cliff and the fact that pedestrians are not allowed on the M2. Instead of expanding connectivity, the development is just degrading the walking track that is already passing through the site, removing the pleasant forest it formerly passed through and replacing the walking track itself with a dead-end road and an electrical substation, and adding a boring and unpleasant concrete path at the west edge directly adjacent to the building that effectively leads nowhere. The proposed internal road is a dead end and does not expand "connectivity" either. As a decrease in both connectivity and recreation, the incentive height should not be granted.

The development thus dismally fails both criteria a) and b) and should not be granted an 'incentive height' of 45m. However, the proposal at 50m+ already exceeds the maximum permitted 'incentive height' of 45m and should be rejected. I am unclear if it also violates the additionally required incentive criteria of "Maximum Incentive FSR: 1.5:1 " but it probably fails this as well. The proposal should be rejected.

VIOLATES REQUIRED LANDSCAPING SETBACKS

As the developer's own report (SEARs Request - Julius Avenue Data Centre.pdf p. 18) states, Macquarie Park Precinct requires:

"Building Line Setbacks

The Building Setbacks Map provided at Figure 11 below prescribes the following building setbacks for the Site.

- 6m setback to all existing and new streets unless otherwise

specified;

- Minimum side and rear boundary setbacks of 9m;

- For the Site, the portion to the south-east of Street 1 is required to

be retained as a landscape setback. "

However as the proposal admits, it violates the required "minimum side and rear boundary setbacks of 9m". To compound this violation, it violates this setback directly adjacent to Lane Cove National Park and this violation should NOT be permitted.

NOT SUITABLE ADJACENT TO LANE COVE RIVER NATIONAL PARK, AND THIS HAS NOT BEEN CONSIDERED DURING DEVELOPMENT PROPOSAL, FOR EXAMPLE, NONE OF "Developments adjacent to National Parks and Wildlife

Service lands" publication requirements ARE MENTIONED, CONSIDERED OR ADHERED TO.

https://www.environment.nsw.gov.au/publications/developments-adjacent-national-parks-and-wildlife-service-lands

The proposed development site is DIRECTLY bordering the lane Cove River National Park. This fact is barely mentioned in the reports, intentionally not marked on the maps, and not taken into consideration at any point during this inappropriate development proposal.

The "consent and planning authorities" should thus assess this development proposal as to how it passes, or rather, fails, the guidelines in this report about developments next to National Parks, which are the estate of the NSW government and all NSW residents and taxpayers. They will quickly see that the proposed development fails almost all these requirements and thus should be rejected.

"2. Issues to be considered when assessing proposals adjacent

to NPWS parks 4

2.1 Erosion and sediment control 4 "

FAIL!

"2.2 Stormwater runoff 5 "

FAIL!

"2.3 Wastewater 8 "

FAIL!

"2.4 Pests, weeds and edge effects 8 "

FAIL!

"2.5 Fire and the location of asset protection zones 10 "

FAIL!

"2.6 Boundary encroachments and access through NPWS land 11 "

FAIL!

"2.7 Visual, odour, noise, vibration, air quality and amenity impacts 12" FAIL!

"2.8 Threats to ecological connectivity and groundwater-dependent

ecosystems 13 "

FAIL!

"2.9 Cultural heritage 14 "

FAIL!

"2.10 Access to parks 15 "

FAIL!

The proposal dismally fails ALL of these, and thus should be REJECTED by "consent and planning authorities" . It may seem superficially to fulfill 2.10 Access to parks' by the fact that hypothetically speaking, an unnatural paved path with unnatural "decorative lighting" [sic] can be used to access the national park, but in reality, park users will be confused by the unnatural access that looks nothing like a national park, the unpleasant light, heat and noise generation, and the fear caused by the round the clock operation and security fencing and guards, probably unsure as to whether it is 'really' a public access path at all. the security guards themselves will probably treat anyone walking past as 'suspicious', and employees may be unaware that the general public is permitted to access the site. During operation, since the complex is privately owned, they can also 'temporarily' close access to the park with impunity, leaving people trapped, especially if they walked from another direction to find the exit 'closed'. In the case of an emergency like a fire, flood, or landslide, this could even lead to the death of people trying to walk through the park, since in these cases, the private paths to exit the park would unambiguously be 'closed' at the first sign of issues, similar to the closure of a shopping centre toilet for 'cleaning' or 'maintenance'.

PEOPLE ARE INTENTIONALLY LED TO BELIEVE IT IS NOT A NATIONAL PARK WHEN THEY DO CROSS THE BORDER INTO THE ADJACENT STRIPS RESERVED AS NATIONAL PARK. INSTEAD THE INTERFACE IS VAST STRETCHES OF CONCRETE AND THOUSANDS OF UNNECESSARY, UNNATURAL "DECORATIVE LIGHTS" [SIC]

See, for example, where as well as the unnatural building and power substation itself, the 'access' to the national park on the south, west and east border of the site, is provided by an unnatural vast expanse of bare concrete lit up with thousands of unnecessary [sic] "decorative lights" along the ENTIRE south and west side of the complex. Yet more unnatural lighting is along THE entire east side of the complex, which is also adjacent to the national park and the larger amount of natural vegetation preserved by the neighbouring private owner. This is in additional to the fact that the towering, massive building itself will be lit up 24 hours a day, so extra lighting is quite literally not required and as the proposal itself admits, is included literally just for inappropriate "decoration".

The fact that this complex provides 'access' to the national park yet is very obviously NOT a national park, will also lead to park users and employees not understanding when they do cross into the narrow strip actually reserved as national park and bound by the laws that apply to national parks, and they will do all the activities banned in national parks. The intentionally unnatural interface to the park exacerbates this risk, since it looks nothing like a national park or anything related to the preservation of a natural environment. People will go there to smoke, throw garbage, take off-lead dogs, and worse. They probably will not even believe there is a national park there. The interface to the national park in this proposed development is so unsuitable that people themselves will be

unaware they are entering a national park, when stepping off the vast expanses of concrete and thousands of 'decorative lights' [sic].

-COMPLETE LACK OF RENEWABLE ENERGY GENERATION

Hypothetically speaking, solar panels could have been put on this massive building complex to generate at least a tiny proportion of renewable energy. Instead 0% of the power will be renewable, and instead dirty pollution from diesel generators with threaten the health and safety of the local community and indeed all of Sydney as it adds to the gross clouds of pollution blown elsewhere.

TOO MANY LIGHTS! "DECORATIVE LIGHTING' SHOULD BE FORBIDDEN!

Since this data centre is a round the clock facility it already operate 24 hours a day, 7 days a week, 365 days a year and is always lit up all times of day or night. During the day it poses a risk by reflecting sunlight, and it is lit up all night 24 hours a day 7 days a week. It already creates a severe risk to both wildlife and humans from the unnatural lighting up created by this building 24 hours a day, which is exacerbated by the elevated position of the building relative to the much lower slope down to the river. Yet for no valid reason whatsoever, the plan is to have additional, unnecessary lighting 24 hours a day, as in EIS Appendix 12 - Landscape Design Report.pdf

p. 34 "Master Plan Analysis Signage and Lighting". this includes an abomination of so-called 'decorative' lighting' in "2" at the side and back of the site, to ensure that maximum disturbance is provided not only to wildlife trying to use the remaining forest and national park, but an even more lit up eyesore is created for anyone viewing the site even from the other side of the river.

The so-called 'decorative lighting' is also a waste of electricity, yet more electrical waste and greenhouse gas emissions in addition to those already caused by the data centre. It is unclear as to why anyone would want to walk next tot he data centre to start with ("2"), and not use the road as before. Yet more lighting is NOT needed when the entire building and complex is already lit up 24 hours a day and there must be normal streetlights as well, even without this additional, "decorative' lighting, which even the plans themselves admit is 'for decoration' and not for any practical necessity at all. It is there to insult everyone who looks at the site even from the far distance of the other side of the river, and to deliberately disturb and kill nay wildlife in the adjacent national park that survives the construction.

AFFECT ON OTHER ABORIGINAL SITES

"AHIMS #45-6-1854) contained middens with oyster and whelk shell recorded, [..] also had possible remnants of stencil art along the back wall. AHIMS #45-6-1855) [also] contained middens with oyster and whelk shell recorded"

Supposedly AHIMS #45-6-1854 is only 20m south of the development site and will be negatively impacted by thgis inappropriate development. AHIMS #45-6-1855 is only slightly further away.

As well as AHIMS #45-6-1854 and AHIMS #45-6-1855 less than 20m from the site, which will be disturbed by construction, excavation, noise, and ongoing damage during operation, there are a large number of Aboriginal sites on the other side of the lane Cove River that look directly across to where this unacceptable and inappropriate data centre will be located. (I have visited many of them

myself in Mobray Park, that is directly across the river.) When people are at these Aboriginal Sites on the other side of Lane Cove River, when they look across instead of seeing natural bushland as at present they will just see a 24 hour a day noisy lit up eyesore of this unnatural data centre and power substation. therefore ALL of the Aboriginal sites in the area will have their heritage degraded and destroyed.

NO BENEFIT TO LOCAL AREA, JUST A LIABILITY

Many people don't understand how data centres 'work'. It is not like a local dam or telephone exchange, where local installations are 'needed' for the local community. By contrast, a data centre does not serve the data needs of the local community, but can and WILL have private clients distributed worldwide due to it being connected to the internet that is global. Whoever is storing their 'data' in Australia are private, foreign companies, possibly even conducting criminal and fraudulent activities, and hiding the 'data' from their home countries. For this reason, a data centre can be located literally anywhere, both anywhere in Australia and anywhere worldwide. Data centres thus should not be located in high value bushland or high density business/residential areas, but should be located in places where there is nothing of value to destroy and few other economic opportunities. So, for example, in the USA, many data centres are built in the middle of the desert. This site is NOT a suitable site for a data centre, ESPECIALLY since there are ALREADY multiple data centres in the Macquarie Park area and the local infrastructure cannot cope with more of these parasitic liabilities.

ZONING AND APPROVAL LAWS ARE OUT OF DATE

Those trying to build data centres at Macquarie Park are exploiting a loophole of the out of date zoning laws that have not been reformed for the 21st century and consider them to be similar to a regular business corporate office building, since no category for 'data centres' exists, and since it is only recently that vast data centres are a thing, are incorrectly categorised as the type of typical business that had a few computers, perhaps a software company. In reality, data centres are similar to expecting a coal fired power plant to be suddenly dumped in one's neighbourhood. Zoning laws would probably not permit a coal fired power plant to be built in the middle of a Sydney residential area and business park, but the zoning laws have not been rewritten to keep up with 2020s conditions and equally inappropriate developments such as this data centre. Not only should this unacceptable development be refused, but the planning laws should be revised to not permit data centres in these sorts of business parks. The data centre is even more inappropriate, since many pre-existing legitimate business and employment opportunities that operate out of existing buildings causing less environmental harm, are being intentionally driven out of Macquarie Park by the NSW State Government to make way for residential skyscrapers. The data centre is also NOT compatible with a high density residential area being built nearby!