

Planning Services  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Attention: - Director , Industry Assessments

Dear Sir/Madam,

**Re: Re: Objection Submission –State Significant Development Application SSD 9741 Lane Cove West Data Centre**

**I object to aspects of the proposal and have concerns or comments about other aspects:**

1. **Objection:- The Data Centre is neither a warehouse nor a distribution centre nor a container storage facility so is incorrectly classified as falling under SEPP (State and Regional Development) 2011's Schedule 1 cl 12.** The proposal is for a high technology industry and it does not fall under SEPP (SRD)2011 so should not be assessed in the current manner. Meeting the \$ value threshold alone does not give qualification for being assessed under the SSD process. The data centre does not fit Cl 12, and warehouse/distribution characteristic cannot be claimed under the SEPP (SRD) when they do not exist, just by utilising a photograph of a warehouse on the cover page to subliminally suggest it is a warehouse . The Consent Authority should be Lane Cove Council.
2. **Missing: – Consideration of future-proofing for re-purposing or recycling of proposed facility, and site remediation/rehabilitation, in event of redundancy of function.** Notwithstanding that there is current growing demand for the services the Data Centre proposes to meet, high technology hardware has a tendency of becoming smaller due to technological advances, and over time, newer processes revolutionise or replace old processes. This enormous proposal has a massive, long-term impact on a highly-sensitive bushland, riverside site by way of excavation and very large site coverage to provide its platform. There is significant loss of trees and habitat on and off site, as well as on-site storage of fuel materials – yet its pavilion design is highly modular and particular to its function. Methods of site remediation, rehabilitation and ways to re-purpose the construction for other uses, should be considered and outlined at the EIS stage with a view to undoing environmental harm and providing for sustainability. This is the more important because the site is precious, in a location where demands due to surrounding intensification of urban living come with the corollary of greater need for preservation of natural environments to provide an antidote.
3. **Missing:- consideration of heat output of external plant (cooling towers, chillers, transformers and diesel generators) and heat absorption/re-radiation of concrete-mass walling/roofing and external hardstand surfaces.** - The EIS has identified noise output as a potential problem, and air quality, but does not consider heat output or cold air blown out by the rooftop and platform plant. In addition, the mass concrete structure, non-cool rooftops, and surrounding hard surfaces are highly likely to create an urban heat island (UHI) effect. Not only is this UHI effect likely to contribute to increase in heat waves on a regional scale, it is also highly likely to be detrimental to surrounding vicinity bushland and wetland areas, with altered hot or cold air turbulence, and night-time re-radiation.
4. **Objection:- Noise output does not comply and solutions are yet to be provided in the EIS.** If solutions are not found to noise mitigation, the result will be loss of the peacefulness of the bushland walking tracks and kayaking on the river, and disturbance to wildlife "24/7". Even then, it appears the 'minimum' requirement only will be met, and this will still adversely impact peaceful tranquillity. The adverse air quality produced by plant, also has not been properly addressed.

5. **Objection:- Bulk and Scale of the Development, and exceeds LEP height.** The clause 4.6 Variation - Height of Buildings - is not considered to provide sufficient justification. Much of the justification for exceeding the height is claimed to be forced upon the proponent by its need for consistency with the surrounding industrial character - but the visual impacts of development on neighbouring property of public reserve land, which is where zones meet, is completely ignored in the analysis. Of the Objectives, it is contrary to *“(b) to ensure that privacy and visual impacts of development on neighbouring properties, particularly where zones meet, are reasonable.”* The proposal exceeds height considerably, and in doing so, it does not meet Objective *“(d) to relate development to topography “*. The same problem applies to the argument about whether meeting the standard is unreasonable or unnecessary - it fails to even consider the public domain of the bushland reserve, the walking tracks, the river, and the surrounding urban areas of Lane Cove and Ryde, which will see the intrusive development in the riverland context. In this case, the test of Clause 4.6 is failed because the flexibility for height sought in the proposal does not achieve *“better outcomes from development “* but produces worse outcomes from the development for all but itself. It is only the proponent, and their tenant, who benefits from the flexibility. Others suffer.
6. **Objection:- Visual Impact** The Visual Impact study is not well-presented for viewer understanding. Clearly a rendered model of the proposal has been worked up, yet no effort has been made to insert different views of this model into photomontages. Photos should be taken using a focal length of 55 mm lens which would much more accurately illustrate the real human viewer's vision, and the models inserted at matching focal length. It is considered that the visual impact of the proposal is highly intrusive. The architectural drawings analysing visual impact have used a trick of implying that the permissible 18m high building extent could be much closer to the bushwalker and hence have a much more intrusive impact. But the reality is, this is not what can be achieved because of required buffers, setbacks, bushfire roads, contaminated areas, and so on. There is a massive long bunker wall facing the bushwalker, relieved only by different coloured slabs of tilt-up concrete or similar. Other than different colours, and some vertical sticks, there is no attempt to soften the rigid parapet line of the rooftop, or create any lacey effects to screen the battle canon-like rooftop plant design. The proposal should be more sympathetic in its position of transition between industrial buildings and the river banks and surrounds. In addition, the elevated columns supporting the driveways are of ugly.
7. **Objection:- Adverse environmental Impact on adjoining wetlands of alterations to surface/subsurface water flow** - inevitable due to large site coverage by buildings and hard surfaces, bulk excavation/fill, loss of rock formations and removal of vegetation.
8. **Objection:- Significant loss of trees and detrimental impact on most other vegetation or potential vegetation on the site, as well as off-site detrimental ramifications** . The two areas of trees on the site, which provide wildlife corridors, are removed by this proposal. In addition, the APZ requirement is to be likely to slash to produce maximum 10cm long grass (p23, Appendix 23) so native grasses and shrubs growth will not be supported. 10 Hollow-providing trees (out of 12), 24 visually significant trees (out of 29), and 73% of total trees are to be removed. The loss of this native vegetation is a significant loss in the band of vegetation which borders the Lane Cove River and Stringybark Creek, and has an impact greater than the actual area lost, because it impacts wildlife habitat and endangered ecological communities of Estuarine Saltmarsh and Swamp Oak forest.

In conclusion, the proposal as designed is not suitable for this site and is insensitive to the environment.

Yours sincerely  
**A resident**

13 May 2019