



Lane Cove Council

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13 May 2019

Our Ref: 24381/19

Your Ref: SSD 9741

Ms Pam Morales
Acting Team Leader, Industry Assessments
Department of Planning and Environment
GPO Box 39
Sydney 2001

Dear Ms Morales,

Lane Cove West Data Centre – 1 Sirius Road, Lane Cove West Notice of Exhibition (SSD 9741)

I refer to your Notice of Exhibition dated 10 April 2019 and accompanying two volumes of the Environmental Impact Statement (EIS) in relation to a Development Application for Lane Cove West Data Centre (SSD 9741).

Executive Summary:

This executive summary is a condensed version which highlights Council's support and concerns in relation to the proposed development. A full and detailed submission elaborating on all concerns raised will be submitted to the Department by **31 May 2019**.

Council supports the proposal in principle and acknowledges that the addition of the Data Centre would be beneficial to the state economy and that of the local area.

Notwithstanding this view Council requests consideration be given to the unique ecological constraints of the site including:

Environmental Concerns:

- The proposal would result in an unacceptable loss of bushland and tree canopy. The proposed removal of 125 trees or 73.1% of all trees on site. This is contrary with the relevant objectives of SEPP 19, Lane Cove LEP 2009, Lane Cove DCP 2010, and Planning priority N19 of the North District Plan;
- The proposed development would potentially have a detrimental impact on the environmentally sensitive areas adjoining the site. These include Coastal Freshwater Swamp Forest, Estuarine Swamp Oak Forest, and Estuarine Saltmarsh;
- The proposal would result in significant cut and fill of the site. The proposed total cut volume of 132,200 cubic metres, and total fill volume of 38,520 cubic metres would result in an excessive amount of disturbance. A revised design would better respond to the existing topography and reduce impacts on adjoining environmentally sensitive areas; and

Visual Impacts:

- Soft vegetated batters should be incorporated rather than hard retaining walls. In particular the retaining walls adjacent to the north road should be reconsidered to ensure the proposal better blends with the natural setting of the site;
- The rooftop condensers should be screened to soften their visual impact; and
- The 3-storey plant building north of the lower access road should be relocated to the southern end of the site where it would be less visually prominent.
- Consider adding fill externally to the building to reduce the visual impact of the building

Traffic Impacts:

- The application proposes 76 vehicle spaces. The proposed number of vehicle spaces does not comply with Part R of the DCP. A minimum of 123 vehicle spaces is required for a development. The applicant is required to clarify and justify their position for reduced parking on site, including initiatives to encourage the use of alternative modes of transport such as public transport and bicycle.

Stormwater Runoff:

- The proposal would result in approximately 74% of the site becoming impervious. This would dramatically increase runoff and directly affect the quantity and quality of groundwater flowing into Stringybark Creek, Lane Cove River and associated sensitive areas; and
- To mitigate stormwater runoff and loss of groundwater flows its impacts on bushland Onsite Stormwater Detention (OSD) and a dispersion system that evenly spreads the water runoff should be incorporated as part of the stormwater management of the site.

Lane Cove Council Site Specific DCP- Location 1 - Land off Sirius Road:

- 1 Sirius Road is subject to site specific planning controls within this DCP.
- The key objectives and principles of the DCP have not been addressed by the applicant in the statement.
 - Clause E14 (a) requires that all buildings be setback a minimum of 20m from Stringybark Creek. It is not clear in the documentation if the built form encroaches the 20m buffer area.
 - Clause E14 (d) requires that no buildings or works be undertaken on any area shown as 'bushland' in the site specific DCP Map. The proposed buildings and carparking areas both appear to significantly encroach into areas earmarked as bushland. Consideration of this environmental habitat needs to be a primary element by the building footprint.

Height:

- Under Clause 4.3 Height of Buildings in the Lane Cove LEP 2009, the site is subject to a maximum building height of 18m. The development proposes a maximum building height of 24m which exceeds the control by 6m or a non-compliance of 33.3%. It is recommended that an alternate building envelope be explored that complies with the objectives of the height controls.
- A clause 4.6 variation statement was lodged. It is the position of Council that the proposed development does not meet all the objectives of the IN2 Light Industrial Zone and further design considerations are necessary to justify any variation.

Further Information:

Council calls for further information, analysis and consideration to be submitted to allow a more comprehensive understanding of the environmental, traffic and site management issues. It is requested that the following information be submitted to the NSW Department of Planning for consideration:

- An amended Tree Protection Plan which shows additional protection measures and the impacts on proposed trees to be retained;
- An amended Sediment Control Plan with consideration being shown to adjoining endangered wetland vegetation and other bushland vegetation;
- A Loading Management plan is required for the site; and
- A study on the overall impacts of the collecting, piping and redirecting a large percentage of the catchment area to adjoining Ecologically Endangered and Sensitive Vegetation.

Conclusion:

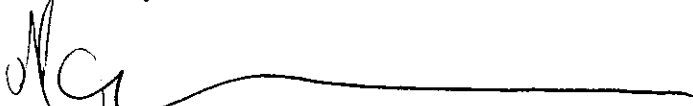
Council acknowledges that the addition of the Data Centre would be beneficial to both the State and Local economy of the area. The proposed high-tech industry would provide employment opportunities to the Lane Cove West Business Park.

However, Council does not support the proposed development in its current form. Primarily, Council does not support the level of tree loss, excavation, impacts on groundwater flows, especially in relation to environmentally sensitive areas including bushland on and adjoining the site.

The proposal is unsatisfactory in its current form and it is recommended that the Minister for Planning request additional information and design changes be made for reasons outlined in this report.

Should you wish to discuss the matter further please call me on 9911 3610.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Mason', followed by a long horizontal line extending to the right.

Michael Mason
Executive Manager
Environmental Services