

## Lane Cove West Data Centre Application SSD-9741: Submission

### SUMMARY

1. The project's commissioned environmental Impact statement is deficient in several aspects. These I list in numbered comments below. I base these comments on reading the main report and several key attachments, and familiarity with the site and its setting over many years.

### MY BACKGROUND

2. I have a long standing interest in Lower Stringybark Creek Industrial activity; on research undertaken in the course of preparing submissions on behalf of the Lane Cove Bushland and Conservation Society to a Developmental Application submitted for the Corbetts/CSR redevelopment by SC Johnson and Son in 1980; and a continuing association with the Stringybark Valley where I grew up and where I have been returning on a regular basis.

### LOCATION & SCALE

3. In broad terms the proposal challenges issues of location and scale; it intrudes on the natural littoral corridors to an overwhelming degree, at 30-40,000 sqm it will almost completely cover a large parcel of degraded land, bordered on south, west and north by a narrow riparian/foreshore zone, coming to within 20m of the Lane Cove River, that, Wades Cornflour heritage area aside is not otherwise developed. It, intrudes below the sandstone cliff line - only the second (and the first in 100 years) in the valley to so do

### ANOMALOUS ZONING

4. The Industrial zoning is an accident of history - when heavy and dirty industry was located away from habitation, accessible only by river.

### PROVISION OF BACKUP ENERGY

5. The design makes no provision for renewable energy back up, but rather requires the storage on site of a large amount (1 million litres) of diesel to run generators in the event of a power break. No provision has been made to exploit the enormous roof area planned for on site energy generation and storage for instance.

### LANDSCAPING FOR STAFF AMENITY

6. The adventitious inclusion of a landscaped amenity area exclusively for staff, exploits the peculiarity of the lot shape - this peninsular of sculpted bushland will not be publicly accessible; any rehabilitation done here would not be coordinated with management of bush generation and clean up in the land adjacent.

### INDUSTRIAL SITING IN THE LANDSCAPE

7. The references to landscaping in the plans do not seem in harmony with the practices of the Lane Cove Council in bushland recovery and management; make no references to recovery for instance, and in any case are said to be enclosed by a 1.8m security fence, thus interfering with connectivity in the narrow shelf of bushland between the river and the cliff, otherwise continuous from Linley Point to Fullers Bridge.

8. While I acknowledge the effort by designers to make this building complex fit into the site, and the easily demonstrable value of this industry establishing itself in the municipality in a zone whose impact on residents is limited, I decry the retrograde and superficial approach to siting, and what appears to be an effort to maximise site coverage.

#### INDUSTRIAL HERITAGE

9. The cultural impact refers to Cumberland Paper Board Mill site on the Lower Stringybark and Chicago mills site on the Lane Cove immediately upstream. This reference is superficial and not based on any contemporary examination of the conjunction of these sites in a zone of industrial activity connected to the Lane Cove River, as for instance mapped in Lynne McLoughlin's 1986 monograph, "The Middle Lane Cove River - a History and a Future' Macquarie University, Centre for Urban Studies..
10. An examination of site association cannot ignore the 50 years of CSR/ Corbett occupation; the role of the Stringybark site in the history of chemical manufacture in Australia, and as a key wartime provisioning factory,, and the pioneering policies of CSR Chemicals in relation to industrial landscaping of its Lane Cove property - credited as the first consciously landscaped industrial site in Australia (as written up in the Land in 1951); just as Corbett's/CSR activity marks the founding of chemical manufacturing in Australia = see for instance back issues of Double Bond, the CSR Chemicals staff magazine.

#### PRIOR SITE CONTAMINATION

11. The history of the site prior to sale to current ownership is not mentioned. There is reference to contamination on the site - traces of molasses - but no details of the degree of reparation required.. It is not only the molasses residue: the site is adjacent to the molasses feeder tanks used by Corbetts/CSR, pumped from barges moored in Stringybark Creek over maybe 25 years: but as well more recent illegal dumps of potentially hazardous waste.
12. There can expect to be the residue of Electricity Commission's occupancy - there does not appear to have been requirement for the site to be rectified at the time of the disposal of the asset.. This should have been noted in the EIS
13. It is a large site, without a prior use cited in the report. This must be relevant to impact. It is likely that the ground, as with other harbourside sites of heavy and pollutant industries (eg the battery site at Homebush Bay), is contaminated; Disturbance in the construction will risk leaching fill into the river; these questions were not taken up in the EIS.

#### ATTENTION TO DRAINAGE

14. There is no drainage plans - the two buildings and associated roads will generate a high stormwater volume that will potentially adversely affect natural drainage patterns.

#### GENERATION OF FILL

15. The fill report shows a large volume of excess fill quarried from the sandstone cliff: Judging by the nearby (Gordon Cr and Epping Road) flat developments cutting into sandstone, a long period (2-3yrs) of highly intrusive noise, or, the likelihood of flooding in the excavations as happened in the Epping Road construction.

#### SIGNIFICANCE OF SHELTERED RIVERINE WILDLIFE CORRIDOR

16. The animal population crossing the site is not given attention. For instance there does not appear to be any survey for reptiles or small mammals; for which this below cliff sheltered bushland presents preferred habitat.
17. Likewise bird behaviour and habitat will be affected. The Cumberland impoundment is a sanctuary for water birds, including visiting birds of national significance such as the Nankeen Night Heron..While this may have been overlooked during construction of the Epping Road flats, it should not be ignored for this state significant development.,
18. The site adjoins and overlaps a grassy open space; natural grassland and grassy ecosystems - with their complex relations between grasses, forbs, shrubs, insects reptiles and birds - have been ignored in the impact statements - it should not have been.

#### INTEGRITY OF BELOW CLIFF HABITAT CORRIDOR

19. The maps used do not make clear just how much the building work intrudes into the below cliff natural habitat (however disturbed it might be by past activity). It is not just a corridor for the walking public, but part of a habitat strip representing pre-1788 natural forms and ecological associations, coexisting with suburban and industrial occupancy.
20. The proposal stretches the industrial zone beyond its intended purpose, thus triggering the need to work closely with landscape planners managing the public reserves, and state managers of the riverine environment. There is no evidence of this yet in the documents produced..

#### SIGNIFICANCE OF LANE COVE REMNANT BUSHLAND

21. Unlike other Mars Road factories this development intrudes into river side bush corridors. These have been a source of pride for Lane Cove residents following actions by Council and citizens to protect bushland habitat since the 1970s in the face of strong developmental pressure (as evidenced in the SC Johnson case).
22. The network of paths through recovering bushland around Lane Cove's foreshores and streams is a major public asset. Its value needs to be recognised in any intrusive proposal. It is a concern for not only nearby residents, but to all people who live in or visit the municipality. The EIS does not recognise these values. It addresses site damage by replacing 'like for like', with tree losses replaced by tree plantings, etc; a once off landscape design, without recognising the interconnectivities of bushland on the margins of cities.
23. Lane Cove can show nationally significant developments in urban industrial landscaping, and planning; its attention to recognising bushland remnants, building expertise and employment in bushland conservation and recovery, and in collaboration between citizen and council in educating the public in the value of healthy bush habitat close to the city centre. It is justly imitated and admired; This reputation should not be compromised by insensitive development.

#### LANE COVE INDUSTRIAL HERITAGE

24. The existing track connects the Lane Cove National Park with the harbour; it passes historical sites, and evidence of earlier river activity, duly explained. Its integrity depends on the separation of urban building, roads etc from the mangrove communities, and the narrow strip of wet temperate rainforest and grassy woodland below the sandstone cliffs, themselves exhibiting remarkable naturally sculpted forms easily visible from the track.

#### ENVIRONMENTALLY SENSITIVE INDUSTRIAL SITING

25. This wrap of the foreshore needs protecting from intrusive, and polluting new industrial activity. The 19th and 20th century examples can remain as of particular interest in this phase of Sydney's growth.
26. For the 21st century it is time to match CSRs mid-20th century defence of the landscape in factory deployment, with a truly 21st century approach that recognises that having large volumes of hydrocarbons stored close to a river, and in a bushfire prone zone, solely as an energy backup is unacceptable; that design can extend to respect of habitat continuity and connectivity, and the likely attention to cleaning up old disfigured and damaged industrial sites using new methods and will.
27. This is at best a 20th century grade proposal - it should aspire to the standards of this century. State Legislation applies to the protection of foreshores; it must be invoked here. Likewise stream and harbour setbacks appropriate to scale and density of activity. There are antecedents in Sydney harbour foreshore protection going back to the 1880s, that were reinforced privately by CSR in this landscaped zone.

#### DEFICIENCIES IN PUBLIC CONSULTATION

28. From deposited papers there is no evidence of consultation with users of the public paths that will be impacted by this development. These tracks have evolved over time as an educational and recreational asset; are used by people from all over the municipality and beyond; and will only become more important as the pressure increases on remnant vegetation in residential and industrial areas.
29. Conspicuously not consulted were the groups who have dedicated time to bush regeneration in the municipality, the Council itself with its vision for bushland remnant management, and expert citizen contributions to planning and environment protection. Not only is the industrial purpose of state significance, but as well the site and surrounds which it would be intruding on: there is room for finding a truly 21st century solution based on open and informed deliberation. The EIS does not give evidence that this approach had been considered.

#### CONCLUSION

30. This submission (nor the original application) has made no reference to the rationality of this site use within the industrial mix of Mars/Sirius Road complex. It is concerned alone with the credibility of the EIS, raising questions about the development's scale, the hazard that goes with its intended operation, intrusion on habitat, and the superficiality of treatment of cultural and environmental values. Lane Cove has a proud industrial past, built on enterprise and vision; part of that vision is to allow for site occupancy to grow into the landscape, not to take it over.

## REFERENCES,

The reader is referred to the 1980 Lane Cove Bushland Society submission to Council in response to the SC Johnson DA for the Corbetts Site; back issues of Double Bond, the staff journal of CSR Chemicals dealing with the history of the Stringybark Creek site- kept by Lane Cove Library, and my own research notes (including bird lists) deposited there. Published treatment is in the 1986 monograph of Lynne McLoughlin, and to the 2019 update of the Lane Cove Guide to Remnant Bushland that she authored published by the Lane Cove Municipal Council.

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