

Submission - Lane Cove West Data Centre - SSD-9741

I am a resident of Lane Cove and a long-standing member of Lane Cove Council's Bushland Management Advisory Committee. While I do not object to the location of a data centre in this area, per se, as it seems a land use compatible with the surrounding area, this proposal is unsuitable for this site and I would like to register objections to the existing proposal on several important grounds:

1. Bulk, height and scale and consequent landscape impacts in a sensitive area
2. Removal of native vegetation patches and other impact on native vegetation in a wildlife corridor and adjacent to a threatened ecological community
3. Actual and potential impacts of a cut and fill operation on both on the site and on threatened ecological communities downslope.

I would also express concern about the level of community consultation conducted to inform such a large proposal. While the consultation report details work done with those directly impacted or in close proximity to the subject site, the range of stakeholders is much wider than that, including Lane Cove Council (especially its bushland division), all those with interests in bushland and environment in Lane Cove, as well as recreational users of the walking paths along the river or the river itself and those who view this area from homes in East Ryde on the slopes above Pittwater Road.

1. Bulk, height and scale

This is a massive building development for this location. The landscape context for this development is not predominantly the industrial zone on the eastern side, in part because the site sits at the end of its own entrance drive and does not present a main street frontage. Rather its landscape context is the view from the west as shown in the photo montage on page 1 of Appendix 5, the Architectural Plans.

The Lane Cove River upstream of Figtree Bridge at Hunters Hill presents a very 'natural' character, a corridor of vegetated slopes punctuated by very few buildings. Such a corridor is highly valuable in an inner urban context. The river is used by many canoeists/kayakers, there are walking tracks on both sides of the river and the river corridor provides a peaceful natural experience close to the many people who live in surrounding areas. This building would be highly intrusive in this landscape. As it sits on a site lower and closer to the river and the vegetation corridor than the rest of the industrial area, it should be far more sympathetic to that environment in its design.

Yet, not only do these buildings occupy as big a footprint as possible on an unevenly shaped site with a section of contaminated land that cannot be developed, the buildings exceed the maximum height allowed under Lane Cove's LEP 2009 by 6 metres (as identified in Table 8 of the Environmental Impact Statement). And this is the case across the whole development, which is essentially a big rectangular box. The application for variation (Appendix 35) does not present any convincing arguments why this exceedance should be allowed, in fact it is quite confused/confusing at some points, arguing that the development maintains the LEP standard, except for exceeding it by 6m.

2. Impact on vegetation in a wildlife corridor

There are two key patches of trees and native vegetation on this site - in the northeast and the southeast corners. The southern patch is directly connected to the reserve bushland along the Lane Cove River while the northern patch is close to the Stringybark Creek corridor. This means that both patches are likely to be being used as habitat, particularly given the important role of the vegetation along both these waterways as wildlife corridors. Strong evidence of this habitat use is the 34 native species that were recorded on the site just for the biodiversity assessment for the development. Judging biodiversity worth purely by the presence of breeding site is a unrealistic as considering the places people live to be only their homes. All bird and animal species need areas of bushland as part of their range for foraging and other activities. Whether animals are breeding on this site is irrelevant to this wider habitat use.

For example, the Powerful Owl, which is listed under the NSW Threatened Species Act as Vulnerable is an important species in our bushland. Normally they require a range of 400 hectares of bush to support a

breeding pair and deep hollows in mature eucalypts for nesting. That there has been an increase in sightings of Powerful Owls in Lane Cove, as well as occurrence of several known breeding sites, when Lane Cove has just 98 hectares of reserve bushland is a success story in the management and restoration of this reserve bushland, as well as an indication of the extent to which such species also rely on the pockets of bushland on private land to increase their available habitat and foraging ability.

Most of the vegetation on this site will be impacted through complete clearing for the buildings or by heavy management in a bushfire Asset Protection Zone. For example, here are currently 171 trees (with diameter 15cm or above) currently on this site. This development will remove:

- 82 trees in fair to good condition (SULE 2d or above), in addition to the 43 to be removed as they are assessed to be in poor condition.
- 24 of 29 visually significant trees
- 10 of 12 hollow-bearing trees

For Lane Cove this is an unacceptable level of loss. While these removals/clearing of native vegetation trigger offset purchases, purchasing offsets which may be within 100km of the development site is totally inadequate. In inner urban Lane Cove, loss of any remnant of native vegetation is serious as there is so little and all remnants are highly valuable as both historical records and in the provision of networked habitats and corridors.

3. Actual and potential impacts of a cut and fill operation

The EIS site analysis of site suitability claims *'the topography is highly suitable for the intended use'* (p.26). In fact is a sloping site (in parts steeply) with rock escarpments, upslope of sensitive ecological communities. Consequently the development would require a major cut and fill operation that will obliterate the sandstone rock escarpments (pictures p.40, Appendix 23) that are an important feature of the river corridor, and require major retention walls and fill to build the platforms to support the buildings.

It is of considerable concern that the Biodiversity Assessment (Appendix 23) claims (p.6) *'there are no important or local wetlands....within the subject site or buffer area'* (1500m radius). While they use a BAM definition, this is obviously inadequate as the statement is demonstrably false. There are three important wetlands communities adjacent to the site along the river - Estuarine Mangrove Forest, Estuarine Saltmarsh and Estuarine Swamp Oak Forest, and the existence of wetlands here is recognised in the EIS for the development at least in Part D Legislative and Policy Context.

These Threatened Ecological Communities, the Saltmarsh and Swamp Oak Forest, have already had substantial impacts in recent years from massive erosion across the subject site when it was unwisely cleared to bare dirt and the steep slopes left open to rainfall impact. The soil from this erosion completely overwhelmed the tiny silt fences around the site and disgorged across these two communities below the site. Lane Cove Council then had to embark on a substantial clean-up operation for these communities.

The potential for similar problems to arise in such a massive building project as in this proposal is very high and the documentation includes no details on how the proponent will ensure NO downslope impacts.

Conclusion

This proposal is unsuitable for this site - it is an overdevelopment of a sensitive site. It would impact local vegetation and wildlife through clearing of important local patches of native vegetation and loss of trees. It exceeds lane Cove's LEP maximum height for this area by 6 metres and its bulk and height are too great for its landscape context in a sensitive river corridor, while the impacts of a cut and fill construction are likely to be unacceptably high.