Submission to: NSW Department of Planning, Housing and Infrastructure

Application: SSD-82052708 — Project Mars Data Centre, 12 Mars Road, Lane Cove West

Property Owner: Banksia Close, Lane Cove West NSW 2066

Date: May 2026

I object to this application in its entirety and ask that it be **refused**.

I own a residential property on Banksia Close, Lane Cove West. We have reviewed the Environmental Impact Statement in full, including all 46 appendices.

I write as the co-owner of one of the most directly affected residential property in this application. My property on Banksia Close and the proposed development on Mars Road are within 30m of each other.

This submission focuses on three grounds for refusal: the Social Impact Assessment and engagement process are built on a false description of the proposal; the noise assessment is fundamentally unreliable; and the direct impacts of this development on this community — in terms of construction, operations, noise, air quality, and infrastructure — have not been adequately assessed. I also address how this proposal fails the NSW Government's own five principles for data centre investment, released in the NSW Data Centre Consultation Paper of March 2026.

The questions I ask throughout this submission are for Goodman to answer in its Response to Submissions, and the absence of credible answers to each is itself grounds for refusal.

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1. The Social Impact Assessment Cannot Support a Consent

The SIA Described the Wrong Building to the Community

The Social Impact Assessment (Appendix JJ, Urbis, 17 February 2026) describes the proposal as including "an approximately **18-metre-tall building**."

The 18-metre building is the permitted height under the Lane Cove LEP 2009. It is not the proposed height. The application seeks a Clause 4.6 variation to build at 28.3 metres — a 57.2% exceedance — and the applicant's own Air Quality Impact Assessment (Appendix T, Table 2) explicitly states the maximum height is **33 metres** — an 83.3% exceedance.

Every member of the community who read the SIA, received the community newsletter, or attended a swing-by session was provided with a building description at the permitted height, not the proposed height. The SIA's conclusions about visual impact, solar access, overshadowing, and amenity for surrounding residents, the Lane Cove Community Nursery, Blackman Park users, and residents of Banksia Close and Wood Street are therefore based on a project description that is materially incorrect. A building of 28.3–33 metres at a 6.3-metre setback from residential properties has fundamentally different visual and amenity impacts from an 18-metre building at the same setback. The community was not assessed on the correct proposal.

Question 1: The SIA describes the proposed building as approximately 18 metres tall. The maximum height sought is 28.3 metres (or 33 metres per Appendix T, Table 2). Will Goodman acknowledge that all community consultation was conducted on the basis of an incorrect building description, and will Goodman commit to

providing a revised SIA — prepared on the basis of the correct building height and with community re-engagement in the immediately affected neighbourhood — before this application is determined?

The Engagement Program Did Not Reach the Most Affected Residents

The community swing-by sessions — the primary face-to-face engagement mechanism for the general public — were held at Lane Cove Plaza, Burns Bay Road, Lane Cove: a commercial precinct 2–3 kilometres from the affected neighbourhood. The Engagement Outcomes Report provides no data on how many of the approximately 45 attendees across both sessions were residents of the immediate social locality, as opposed to the broader Lane Cove LGA.

My property, in the immediate vicinity of the proposed facility — was never directly contacted for an interview, individual briefing, or any form of targeted engagement.

Lane Cove Council formally advised Goodman to stop all community engagement during the consultation process. This is recorded in the SIA's own Table 7: "the Council advised stopping all engagement with the community." Lane Cove Council subsequently lodged a 40-page formal objection to the proposal. A consultation program that the primary local government authority found sufficiently problematic to request its suspension cannot be characterised as adequate under the DPHI Social Impact Assessment Guideline (2025).

The exhibition period ran from 27 March to 28 April 2026, spanning the entire Easter school holiday period, directly impacting the families of Lane Cove West Public School — a sensitive receiver 160 metres from the site whose students and staff will be directly affected by 34 months of construction and ongoing generator testing.

The community newsletter distributed to 1,144 properties (Appendix A of the SIA) states the facility would operate "**25 hours a day**, 7 days a week." No correction or follow-up was issued.

Question 2: The community newsletter distributed to 1,144 properties stated the facility would operate 25 hours a day. Lane Cove Council advised Goodman to cease all community engagement mid-process. Swing-by sessions were held in a commercial precinct 2–3 kilometres from the directly affected neighbourhood. What quality assurance process governed the preparation and distribution of community consultation materials, and what specific steps did Goodman take, following Council's request to pause engagement, to ensure that re-engagement was representative of the views of residents immediately adjoining the site?

The Community's Own Response

The SIA's community survey (Chapter 4) recorded the following findings, which appear in the SIA's own tables:

- **85.7%** of respondents (42 of 49) anticipated the development would negatively impact the community
- **76.9%** (30 of 39) identified no positive impact from the proposal
- **45.8%** (22 of 48) said the proposal should be relocated to a different site
- **47.2%** (17 of 36) stated the development should not be approved

Since the SIA's data cut-off of 11 December 2025, over **1000 residents have signed a petition opposing this development** — more than twenty times the 49 people whose survey responses inform the SIA's conclusions. The SIA was signed on 17 February 2026 and lodged in March 2026. The SIA contains none of this material.

Question 3: The SIA's own survey found 85.7% of respondents anticipated negative community impacts and 47.2% stated the development should not be approved. Will Goodman provide an updated Social Impact Assessment incorporating all community feedback received up to the close of the exhibition period, and specifically identify what design or siting changes were made in direct response to the community's objections?

2. The Noise Assessment Cannot Be Relied Upon

The Assessment Was Not Prepared for This Site

The Noise and Vibration Impact Assessment (Appendix U, SLR Consulting, 2026) opens Section 1.1 with: "The site is located on Country of the **Gadigal people** within the local government area of **Bayside Council**."

The site is on Cammeraygal Country, within Lane Cove Council's local government area. The Gadigal people are the traditional custodians of inner Sydney's south shore — Circular Quay, Pyrmont and Darling Harbour. Bayside Council covers the Botany Bay area — Mascot, Wolli Creek and Rockdale. This is verbatim text from a different project that was not corrected before formal lodgement. It establishes that the NVIA was not prepared fresh for 12 Mars Road but was recycled from another application with site-specific content incompletely substituted.

Question 4: The NVIA states the site is on Gadigal Country within Bayside Council's LGA. Both are factually incorrect. Will Goodman identify which project this text was sourced from, and commission an independent technical review to confirm that all monitoring locations, receiver identifications, meteorological inputs, and modelling assumptions in the NVIA are genuinely site-specific to 12 Mars Road, Lane Cove West?

The Noise Baseline Is Unreliable

The NVIA's own Table 2 confirms the closest residential receiver (NCA02) is **25 metres east** of the proposed facility. Monitoring points L01 (17 Banksia Close) and L02 (10 Banksia Close) bracket the immediately adjoining residential property. The NVIA records daytime LAeq measurements of 58 dB(A) at L01 and 55 dB(A) at L02.

The NVIA does not disclose that during the entire monitoring period (February, March, April, November and December 2025), Interflow Pty Ltd was conducting continuous infrastructure works on Banksia Close, Cullen Street and Hallam Avenue, installing water mains for the adjacent data centre facility. These works involved daily road cutting, heavy vehicle movements, mechanical excavation and paving. They are not mentioned anywhere in the EIS. The baseline ambient noise environment at NCA02 recorded during this period is therefore artificially elevated by a significant construction noise source that has since ceased. The true long-term background at NCA02 is lower than the monitored data shows. This means the predicted gap between background and operational noise is narrower than the assessment presents, and the actual operational impact on NCA02 receivers is understated.

Additionally, the NVIA describes Banksia Close as being to the **north** of the site. It is to the **east**. This directional error affects wind dispersion modelling for generator emission plumes, misidentifying which residential receivers are in the path of the dominant wind directions.

Question 5: Noise monitoring was conducted during a period when Interflow Pty Ltd was conducting daily construction works on Banksia Close, Cullen Street and Hallam Avenue — works not disclosed or acknowledged anywhere in the EIS. Will Goodman acknowledge that the noise baseline at NCA02 is affected by this undisclosed construction noise source, commission supplementary noise monitoring during a representative baseline period free of major nearby construction, and provide a revised baseline and operational impact assessment before this application is determined?

The Assessment Uses Indicative Plant with No Committed Tenant

The NVIA acknowledges in multiple sections that all mechanical plant is indicative and will be reviewed at detailed design stage once tenant requirements are confirmed. This means the operational noise predictions on which the NVIA's compliance conclusions are based do not reflect the actual equipment that will be installed, at the actual load levels at which it will run.

There is documented precedent in this precinct for indicative-plant noise assessments producing predictions that are materially different from actual operational performance. I am not asking Goodman to account for another operator's results. I am asking Goodman to explain, with specificity, what binding mechanism will ensure that the noise predictions in this NVIA are borne out by actual operational performance at NCA02, 25 metres from the proposed facility — and what remedy is available to residents on Banksia Close if they are not.

Question 6: The NVIA relies on indicative plant specifications with no committed tenant and no finalised mechanical design. The facility's actual noise performance at NCA02 will depend on plant selected and operated by a tenant not yet identified. What specific, binding, pre-operational independent verification mechanism does Goodman propose to ensure that actual operational noise at NCA02 — 25 metres from the facility — complies with the applicable noise triggers before the facility commences 24/7 operation?

Question 7: If operational noise at NCA02 exceeds consent conditions after the facility commences operation, what is the specific remedy available to residents of Banksia Close — and within what timeframe can they expect that remedy to be enforced?

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3. The Direct Impacts of This Development on the Surrounding Community

34 Months of Major Construction at 6.3 Metres from Residential Properties

The main EIS (Section 3.9) states construction will take **24 months**, commencing Q1 2026. The Infrastructure Report (Appendix KK, Section 2.7) states construction will take **34 months**, commencing Q1 2027, with operation commencing Q4 2029. These documents cannot both be correct. The main EIS also states a commencement date — Q1 2026 — that had already passed at the time of lodgement in March 2026.

The Construction Noise and Vibration Management, Construction Traffic Management Plan, and Social Impact Assessment each depend on knowing the construction duration. If any of these assessments used the 24-month figure from the main EIS and the correct figure is the 34-month figure from Appendix KK, they have each underestimated the duration of impacts on residents of Banksia Close, Wood Street, and Avalon Avenue by more than 40%.

Residents of these streets — at a confirmed setback of 6.3 metres from the eastern site boundary — are entitled to know which construction program is proposed, whether the assessments of noise and traffic impacts reflect the correct duration, and what protections will apply for the full period.

Question 8: The main EIS states 24 months construction commencing Q1 2026. Appendix KK states 34 months commencing Q1 2027. Which is correct, and which figure was used as the input to the Construction Noise and Vibration Management modelling, the Construction Traffic Management Plan, and the Social Impact Assessment? If any of these assessments used the 24-month figure and the correct figure is 34 months, will Goodman resubmit each affected assessment based on the correct construction program?

49 Diesel Generators, 155.2 Annual Testing Hours, Adjacent to a Primary School

This facility will house **49 diesel generators** (Appendix FF) and store over **1,049,000 litres of diesel** on site. Annual generator testing will total **155.2 hours** (Appendix T, Table; Appendix KK, Table 3), conducted Monday to Friday between 7am and 5pm — during school hours at Lane Cove West Public School, 160 metres from the site boundary, and during business hours for residents working from home at NCA02, 25 metres from the site.

The Air Quality Impact Assessment (Appendix T) acknowledges that in an emergency scenario — concurrent operation of all generators during a grid supply interruption — the development "may result in significant cumulative air quality impacts," including NO_2 1-hour criteria exceedances at multiple receptor locations. The proposed mitigation for this scenario is notification to neighbouring properties.

Lane Cove already ranks third worst in NSW for blackout frequency on a per-outage basis, based on Ausgrid customer data (PSS Distributors analysis, December 2024). An emergency generator scenario is not a remote possibility at this location.

Question 9: The AQIA acknowledges that emergency concurrent generator operation may produce significant cumulative air quality impacts, including NO_2 exceedances at multiple receptors. The proposed mitigation is notification to neighbours. Lane Cove West Public School is 160 metres from the site and a childcare centre is within the immediate precinct. What specific, binding air quality management measures will Goodman implement to protect children at these facilities during both scheduled generator testing and emergency generator operation — beyond issuing a notification after the event?

Question 10: Generator testing of 155.2 hours per year will occur Monday to Friday, 7am–5pm — during school hours. How does Goodman propose to manage the cumulative noise and air quality impact of this testing schedule on NCA02 residents at 25 metres and on Lane Cove West Public School at 160 metres, given that the actual testing load levels and frequency will depend on a tenant not yet identified and plant not yet specified?

Water Infrastructure: Confirmed Capacity Has Not Been Established

Sydney Water's Feasibility Letter (Appendix KK, Appendix B, dated 8 May 2025) states, in terms:

- *"The existing drinking water system has **limited capacity** to serve the proposed development and may require trunk network upgrades."*
- *"We have **not allocated any system capacity** to your proposal from the investigation into this Feasibility advice."*
- *"Where there is system capacity, **it may have been fully utilised** by the time you obtain a Consent."*
- *"This information is accurate at today's date only."*

The EIS's water management documentation states the facility's annual water consumption as approximately **510 million litres per year** — drawn entirely from potable supply, with no recycled water commitment despite the NSW Data Centre Consultation Paper (March 2026) stating that "data centres should utilise recycled water for water-intensive cooling systems, where feasible."

Ausgrid has not confirmed the final electricity supply capacity or route to the site (Appendix KK, Section 2.1: "final day supply capacity to be advised").

Section 4.15(1)(c) of the Environmental Planning and Assessment Act 1979 requires the consent authority to consider "the suitability of the site for the development." A site for which neither the water authority nor the electricity distributor has confirmed sufficient capacity to serve the proposed development is not a site whose suitability has been established.

Question 11: Sydney Water has formally confirmed it has not allocated system capacity to this proposal and that capacity may not exist at consent date. Ausgrid has not confirmed supply capacity or route. Will Goodman provide written confirmation from Sydney Water that capacity has been formally allocated to this development, and written confirmation from Ausgrid of final supply capacity and route, before this application is determined? If new water or electricity infrastructure requires works on residential streets, will Goodman identify in advance which streets will be affected, for how long, and provide a binding commitment to meet the full cost of those works?

Question 12: The facility's EIS documentation states annual water consumption of approximately 510 million litres from potable supply. No recycled water commitment is included in the proposal despite the NSW Data

Centre Consultation Paper identifying this as a baseline expectation. What assessment has Goodman conducted of the feasibility of recycled water supply for this facility, and what is the specific basis for concluding that recycled water is not feasible at this location?

What Will This Development Do Differently?

There is one data centre already operating in this precinct. Independent reporting and Lane Cove Council's submission of 20 April 2026 document compliance issues at that facility, including noise performance that diverged materially from the predicted figures on which consent was granted. I am not asking Goodman to account for another operator's record. I am asking a direct question the EIS does not answer: what is different about this development's assessment methodology, compliance framework, and infrastructure approach that will produce a different outcome for residents of Banksia Close, Wood Street and Avalon Avenue?

Question 13: This EIS proposes the same post-approval noise verification approach, the same indicative-plant noise methodology, and the same post-consent utility negotiation model used for the existing data centre in this precinct. Given that this approach has produced documented noise compliance divergence and undisclosed infrastructure works on residential streets at the adjacent facility, what specific, binding, independently verified mechanisms does Goodman propose that would prevent equivalent outcomes at 12 Mars Road — and at what point in the process, before or after residents are impacted, would those mechanisms apply?

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4. This Proposal Fails the NSW Government's Own Principles

The NSW Data Centre Consultation Paper (Infrastructure NSW, March 2026) establishes five principles for sustainable data centre investment in NSW. Its consultation period closes on 8 May 2026 — three days after the deadline for submissions on this application. The NSW Government has publicly acknowledged that the current planning framework for data centres requires reform. This application is being assessed under that framework, at the moment of that acknowledgement.

Principle 1 — Jobs and economic growth. This development will generate 26 operational jobs (main EIS, Table 9) while displacing 210 workers currently employed on the site (SIA, Section 6.2.7.2). Lane Cove Council's submission, citing SGS Economics data, notes that data centres generate approximately 26 jobs per hectare compared with 46 for other employment land uses — reducing employment density on employment-zoned land by approximately 43%. The SIA claims 350 construction FTE (Section 6.2.7.1); the main EIS states 200 FTE (Table 9). Neither figure can be substantiated without a committed tenant and a finalised design.

Principle 2 — Developers fund infrastructure without increasing costs for households. Sydney Water has not confirmed supply capacity. Ausgrid has not confirmed electricity supply. All utility negotiations are deferred to post-consent. The Consultation Paper states that data centres "are likely to use the spare water infrastructure capacity, which has been built to service future customer demand, like households." This proposal provides no mechanism to prevent that outcome, and defers the question of what utility infrastructure will be required — and who will pay for it — until after consent is granted.

Principle 3 — Efficient and sustainable use of resources. The Consultation Paper states data centres "should utilise recycled water where feasible." This proposal draws entirely from potable supply. The Consultation Paper specifically identifies "management of data centres clustering near sensitive sites (e.g. residential areas or schools)" and "further work needed to manage the impacts of backup diesel generators" as requiring urgent attention — acknowledging that existing frameworks are insufficient. This proposal places 49 diesel generators 25 metres from residences and 160 metres from a primary school, with NO_2 exceedances admitted in emergency scenarios, mitigated by neighbour notification. No on-site renewable energy generation is proposed in the EIS as lodged.

Principle 4 — Reliable and transparent data. The Consultation Paper requires "reliable and transparent water and energy demand data." This EIS presents four different power capacity figures across its documents, a noise baseline contaminated by undisclosed construction works, and a Social Impact Assessment describing a building 57% shorter than what is proposed. The Department has received an EIS containing at minimum 24 confirmed internal inconsistencies across 46 appendices. This is not reliable or transparent data.

Principle 5 — Planning settings must account for location and community needs. The Consultation Paper states "noise and pollution impacts are more pronounced on these sites, particularly when multiple data centres are clustered in a single location in close proximity" and that "greater flexibility should apply where infrastructure and resources are less constrained." The inverse necessarily follows: where infrastructure is constrained — as Lane Cove is, with confirmed water supply limitations, power reliability concerns, and an existing operating data centre in the same precinct — more rigorous scrutiny is warranted, not less. This proposal does not meet that standard.

Question 14: The NSW Data Centre Consultation Paper, released on the same day this application went on public exhibition, identifies data centre clustering near schools and residential areas, diesel generator health impacts, recycled water obligations, and reliable data for assessment purposes as specific areas where the current planning framework is inadequate. Can Goodman demonstrate, with specific reference to each of the five principles, that this proposal meets the NSW Government's stated expectations for sustainable and equitable data centre investment? If Goodman cannot, on what basis should the Department approve it under a framework the Government has acknowledged needs to change?

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5. Conclusion: This Application Should Be Refused

The Social Impact Assessment described an 18-metre building to a community being asked to accept a building of 28.3–33 metres. Consultation was conducted without Council's knowledge, suspended at Council's request, and held in a commercial precinct several kilometres from the affected neighbourhood. The SIA's own survey recorded 85.7% negative anticipated impact, 76.9% no positive impact, and 47.2% saying the development should not be approved. Over 1000 residents have since petitioned in opposition — twenty times the number consulted by Goodman. None of this is reflected in the SIA's conclusions.

The noise assessment identifies the wrong country and the wrong council for the site, models a baseline artificially elevated by 15 months of undisclosed construction works on Banksia Close, and relies on indicative plant for a facility with no committed tenant. The waste management, traffic, and infrastructure assessments were each prepared on the basis that the nearest residential receiver is 200 metres away. The applicant's own acoustic data places it at 25 metres.

This development will impose at minimum 34 months of major construction at a 6.3-metre setback from residential properties, 155.2 annual hours of diesel generator testing during school hours, and approximately 510 million litres per year of potable water consumption — from a supply system that has not confirmed it can provide that water. All utility negotiations are deferred to after consent is granted.

The NSW Government's own Consultation Paper confirms the framework under which this application is assessed is inadequate for facilities of this scale, in locations of this sensitivity, with this level of precinct clustering. It names each of the substantive failures documented in this submission.

The fourteen questions in this submission represent material gaps that Goodman must answer in its Response to Submissions. If Goodman cannot answer each with specificity and with binding, independently verifiable commitments, that is itself the case for refusal.

I ask the Department to refuse this application.

Appendix A — Internal Discrepancies, Conflicting Assumptions and Unresolved Gaps Across the EIS Pack

A. Core project description discrepancies

- **Height: 18m vs 28.3m vs 33m.**
  The Social Impact Assessment describes the proposal as an "approximately 18-metre-tall building" operating 24/7, while the main EIS states the data hall buildings rise to a maximum height of **28.3m**, and the Engagement Report told community members the proposed building height would range from approximately **13m to 33m**.
  Discrepancy: social impact appears to have been assessed on a materially lower building height than the design/engagement material.

- **Height-control variation basis: 28.3m vs 33m.**
  The main EIS project summary lists **maximum height 28.3m**, while other project material given to the community refers to **33m**.
  Discrepancy: the Clause 4.6 / height variation assessment appears framed around 28.3m, but the community was told the proposal may reach 33m. The applicant should reconcile whether 33m includes plant, screens, roof structures, generators or other elements.

- **"Three-storey data centre" vs actual multi-level data centre mass.**
  Multiple reports describe a "three-storey data centre building," but the main EIS says the data hall buildings contain five segmented halls across several levels, while architectural sections show lower ground, ground, level 01, level 02, roof level and top-of-screen/plant zones.
  Discrepancy: the simple "three-storey" description understates the perceived scale, plant levels and vertical mass.

- **Power demand: 81MW vs 90MVA / 90MW references.**
  The main EIS says Goodman intends to redevelop the site for an **81MW** data centre, and also says the proposal is anticipated to utilise **81MW** total estimated power supply. Other documents refer to a **90MVA** substation/transformers in the noise and architectural material.
  Discrepancy: the EIS should clearly reconcile IT load, total power supply, transformer capacity and substation capacity, because these drive noise, heat, water, generator, dangerous goods and infrastructure impacts.

- **Power infrastructure partly outside the SSDA boundary.**
  The Infrastructure Report says augmentation of the high-voltage network is expected and Ausgrid will advise final supply capacity and feeder routes; it also says feeder supply routes are outside the subject site boundary and will be approved under utility permitted development rights.
  Discrepancy/gap: off-site electricity infrastructure required for the development is not fully assessed in the EIS, despite being necessary for operation.

B. Residential proximity and sensitive receiver discrepancies

- **Residential distance: 200m/250m vs 50m vs immediate/near-boundary assessment points.**
  The Landscape Report states the closest residential uses are **200m east** on Wood Street and **250m north** on Banksia Close. The Air Quality Assessment says the closest residential properties are approximately **50m east** on Wood Street and **50m north** on Banksia Close. The Noise Assessment includes measurement locations at the end of Mars Road/Banksia Close, behind 64

Wood Street near the Community Nursery, and in front of 8 Banksia Close.
Discrepancy: key reports use materially different residential proximity assumptions. Reports relying on 200m/250m separation may under-assess impacts.

- **Residential interface described as "further east" despite direct sensitive interface.**
  The Clause 4.6 Variation Request says residential properties are located "further east," while also acknowledging a public recreation area to the south and the Lane Cove Community Nursery directly adjoining the north-eastern corner.
  Discrepancy: this language downplays the sensitive residential/community interface compared with the noise monitoring and site-context evidence.

- **Sensitive receiver hierarchy inconsistent across reports.**
  The Noise Assessment treats multiple NCA locations around Banksia Close/Wood Street and the Community Nursery as relevant acoustic environments. The Landscape Report instead frames residential uses as 200m/250m away.
  Discrepancy: the same project alternates between close sensitive receivers for acoustic purposes and distant residential context for visual/landscape purposes.

C. Employment and public benefit discrepancies

- **Construction jobs: 200 vs 350.**
  The main EIS states the proposal will create **200 full-time equivalent construction jobs**. The Engagement Report states Goodman told the community the project would generate **350 full-time jobs through construction over a 34-month period**.
  Discrepancy: the employment/public benefit claim varies materially between the EIS and engagement material.

- **Operational jobs: 26 vs up to 45.**
  The main EIS states the data centre will provide **26 ongoing operational jobs**. The Engagement Report states Goodman anticipated **up to 45 full-time operational jobs**.
  Discrepancy: operational employment benefit is inconsistently represented.

- **Operational employment vs parking/staff assumptions.**
  The main EIS lists only **24 at-grade parking spaces** and **26 operational jobs**. The Engagement Report says up to **45 full-time jobs**.
  Discrepancy: transport/parking/public-benefit assumptions need reconciliation.

- **Public interest claim inconsistent with appendices.**
  The main EIS says "No adverse environmental, social or economic impacts will result from the proposal." The SIA identifies **medium negative** mitigated construction noise/vibration impacts, and the Noise Assessment predicts construction noise exceedances at residential and active recreation receivers.
  Discrepancy: the main EIS overstates the conclusion and is not supported by the appendices.

D. Noise, generator testing and acoustic assessment discrepancies

- **Construction noise: EIS acceptability vs predicted exceedances.**
  The Noise Assessment predicts construction noise at **NCA02 residential** up to **85 dBA** during hard-rock excavation and at **active recreation NCA02** up to **85 dBA**, above the listed NMLs. The

SIA still reduces construction air/noise impacts through management-plan style mitigation.
Discrepancy: significant predicted construction impacts are softened in the social and main EIS conclusions.

- **Blackman Park generator testing not carried through to the SIA.**
  The Noise Assessment explicitly models generator maintenance/testing, with **49 generators**, quarterly and annual testing, one generator plus two load banks at a time, **155.2 cumulative hours**, between **7am and 5pm Monday to Friday**. The SIA rates Blackman Park amenity as **negligible** after mitigation.
  Discrepancy: the SIA does not meaningfully assess the lived impact of generator testing on Blackman Park users, despite the acoustic appendix identifying this as an operational scenario.

- **Emergency generator operation assessed for information only.**
  The Noise Assessment says it is not considered reasonable for the development to meet operational noise criteria during infrequent emergency all-generator operation; predicted levels are provided for information only.
  Discrepancy/gap: the SIA/main EIS nevertheless present operational noise as negligible/acceptable, without treating emergency all-generator operation as a social or amenity impact.

- **Low-frequency / tonal noise unresolved because plant is still indicative.**
  The Noise Assessment includes mechanical plant data, octave-band information and indicative noise sources, including cooling tower sound power data and warnings that frequency inverters can increase sound levels.
  Discrepancy/gap: conclusions about operational noise are being drawn before final plant, louvre, silencer and tenant requirements are fixed.

- **Noise monitoring locations show sensitivity near Banksia Close/Wood Street, but other reports frame residents as distant.**
  The Noise Assessment records attended monitoring at the end of Mars Road/Banksia Close, behind 64 Wood Street adjacent to the Community Nursery, and in front of 8 Banksia Close. The Landscape Report states closest residences are 200m/250m away.
  Discrepancy: the sensitive receiver baseline is inconsistent across technical disciplines.

E. Diesel, dangerous goods and fire safety discrepancies

- **Generator/fuel system: 8 in-ground tanks vs other diesel storage descriptions.**
  The Infrastructure Report says the backup system comprises **49 low-voltage diesel generators** served by approximately **8 in-ground bulk fuel storage tanks**. The Engagement Report told residents diesel would be stored in steel tanks enclosed within a **4-hour fire-rated, bunded room** with leak detection.
  Discrepancy: the physical storage arrangement is unclear: in-ground bulk tanks versus fire-rated bunded room/steel tank description.

- **Backup power alternatives dismissed but sustainability narrative remains positive.**
  The Infrastructure Report says solar with battery storage is “not suitable,” wind with battery storage is “not suitable,” hydrogen fuel cells are “not suitable,” and green hydrogen/HVO are not suitable in the near term. Diesel generators are listed as “suitable.”
  Discrepancy: sustainability/public-interest framing should be reconciled with the practical reliance on diesel backup.

- **Dangerous goods documentation not complete at assessment stage.**
  The Dangerous Goods Report identifies the need for a DG Risk Assessment and Emergency Response Plan.
  Discrepancy/gap: dangerous goods risks are treated as manageable, but key operational safety documents are future requirements rather than exhibited final documents.

- **Fire strategy is conceptual, not final.**
  The Fire Safety Concept Strategy says a fully prescriptive NCC DtS approach is unlikely to satisfy the desired design, multiple Performance Solutions are proposed, and the complete fire engineering analysis will be included in a future Fire Engineering Report.
  Discrepancy/gap: the EIS relies on fire safety being capable of resolution, but the final fire-engineered solution is not exhibited.

- **Lithium-ion battery fire behaviour acknowledged, but public/social impact treated as negligible.**
  The Dangerous Goods Report notes lithium-ion thermal runaway may continue even with water and sprinkler systems are intended to attenuate radiant heat/cool modules rather than extinguish the reaction. The SIA still rates operational health/wellbeing and cumulative social impacts in low/negligible terms.
  Discrepancy: technical hazard complexity is not reflected in social impact conclusions.

F. Air quality discrepancies

- **Emergency NO_2 exceedance risk vs no/limited operational monitoring.**
  The Air Quality Assessment says emergency-condition modelling predicts a **low risk of exceedance of the 1-hour NO_2 criterion at four of the nearest receptors**. The SIA rates operational air quality as **negligible** after mitigation.
  Discrepancy: the SIA conclusion does not reflect the AQIA's identified emergency NO_2 exceedance risk.

- **Emergency generator operation treated as rare but not fully socialised.**
  The Air Quality Assessment treats emergency generator operation as unlikely/low risk, while the Noise Assessment says all-generator operation is outside normal criteria and for information only.
  Discrepancy: combined emergency noise + air quality + community notification impacts are not fully carried into the SIA.

- **Air quality receptor count vs community receptor explanation.**
  The Air Quality Assessment refers to modelling of 57 sensitive receptor locations.
  Gap: the EIS/community material does not clearly identify for residents which homes/park/nursery/school locations are the worst affected receptors.

G. Trees, canopy, vegetation and visual-screening discrepancies

- **Tree numbers: 90 removed, 132 retained, 104 replacement vs different canopy/planting figures elsewhere.**
  The main EIS says **90 trees removed**, **132 retained**, **104 replacement trees**, and lists tree canopy cover of **9,290m^2 / 24.7%**. The Urban Heat Island Advice lists tree canopy cover as

29.6%.
Discrepancy: canopy cover figures are inconsistent and should be reconciled.

- **Landscape DCP canopy target vs proposed canopy.**
  The main EIS lists **24.7%** canopy. The Urban Heat Advice lists **29.6%** canopy. The community should be told which number is correct and whether it meets the relevant Council target.

- **Visual assessment relies on vegetation while vegetation is being removed.**
  The Architectural Design Report says mature trees have been retained extensively toward the south and new plantings will create a green edge; it also says embedding the building in topography conceals much of its height and bulk. The main EIS confirms **90 trees will be removed**.
  Discrepancy: the visual mitigation relies on vegetation, but existing vegetation is materially reduced and replacement planting will take time to mature.

- **Street/frontage screening focus vs eastern/southern sensitive interface.**
  The Landscape Report's street-frontage section focuses on screening the built form/substation from Mars Road. The most sensitive receivers are to the east and south, including residential properties, Blackman Park and the Community Nursery.
  Discrepancy: design mitigation appears concentrated on the public street frontage, while the more sensitive residential/park/nursery interfaces are less clearly assessed.

- **Vegetation value: lay "scrub" characterisation vs arborist/BDAR value.**
  The SIA/engagement material records user perceptions of vegetation, while the BDAR identifies potential Large-eared Pied Bat species polygons/habitat context and the Arborist Report assesses tree retention values.
  Discrepancy: social/amenity conclusions should not rely on lay descriptions of vegetation if technical reports identify biodiversity/habitat/canopy functions. Note: the BDAR should be used carefully; it identifies PCT/native vegetation and species-credit issues, not necessarily CEEC.

H. Visual impact assessment discrepancies

- **Visual impact from private residential dwellings is acknowledged but not adequately modelled.**
  The VIA acknowledges potential views from **10 Banksia Close**, approximately five Wood Street dwellings, and other Wood Street dwellings, but concludes impacts are low.
  Discrepancy/gap: potential private residential views are acknowledged, but property-specific photomontages from the closest homes are not provided.

- **Blackman Park is a major visual/social receiver but is under-represented in photomontages.**
  The VIA baseline recognises Blackman Park directly south of the site, including sporting fields, dog park, tennis club and skate park.
  Gap: assessment from the park appears limited relative to the number and diversity of park use areas.

- **Visual impact relies on Physical Absorption Capacity but tree removal/canopy maturity is unresolved.**
  The VIA places weight on mature trees and topography limiting views. The EIS confirms 90 trees are removed and replacement planting is proposed.
  Discrepancy: the visual baseline may overstate screening if it does not distinguish retained trees from removed trees and "year zero" post-construction conditions.

I. Social Impact Assessment discrepancies

- **SIA says it should assess direct, indirect, physical and intangible impacts, but conclusions are very low.**
  The SIA says it considers physical and intangible, direct and indirect, short- and long-term impacts. It then rates Blackman Park amenity as **negligible**, operational noise as **negligible**, operational air quality as **negligible**, and visual impact as **negligible to low positive**.
  Discrepancy: the SIA's own broad methodology is not reflected in its narrow/negligible findings.

- **SIA is based on early/stale information.**
  The SIA states its assumptions include information and events up to **11 December 2025** only.
  Discrepancy: the SIA does not reflect later public exhibition response, Council's formal objection or the petition/community mobilisation.

- **Survey sample vs scale of community objection.**
  The SIA survey recorded **92 responses**, including **57 completed responses**. Council later recorded a petition with hundreds of responses and a formal objection.
  Discrepancy: early survey response is not representative of later community sentiment.

- **Blackman Park recognised as diverse community infrastructure but impact rated negligible.**
  The SIA baseline says Blackman Park has synthetic fields, turf fields, multiple sports, lights for night games/training, Scouts, Girl Guides and Imagination Dance. Yet the SIA rates Blackman Park amenity impact as negligible after mitigation.
  Discrepancy: assessment conclusion is inconsistent with the park's acknowledged social role.

- **Community Nursery identified but not treated as standalone social infrastructure.**
  The SIA includes a photo of the Lane Cove Community Nursery and Eco Garden adjoining the site. The Noise Assessment includes monitoring adjacent to the Community Nursery.
  Gap: the SIA does not adequately assess the nursery as a standalone sensitive social infrastructure asset.

- **School engagement weakness.**
  The Engagement Report records Lane Cove West Public School said the relieving principal and deputy first became aware of the proposal when a family brought it to their attention, despite previous correspondence.
  Discrepancy/gap: engagement was recorded as having occurred, but the school itself reported not actually receiving/being aware of the earlier material.

J. Water, stormwater and urban heat discrepancies

- **Stormwater quantity/quality vs loss of beneficial stormwater reuse.**
  The Stormwater Report focuses on on-site detention, water quality and discharge management. Council has separately raised the issue of existing stormwater reuse supporting Blackman Park irrigation.
  Discrepancy/gap: "no increased runoff risk" is not the same as assessing loss or alteration of beneficial stormwater reuse.

- **Urban heat requirement vs short qualitative advice.**
  The Urban Heat Island Advice acknowledges the requirement to evaluate heat rejection on

habitable rooms and communal open spaces, including neighbouring properties. It then provides qualitative mitigation measures and broad canopy/SRI statements.
Discrepancy/gap: SEARs require evaluation of heat rejection impacts; the appendix does not appear to provide property-/park-/nursery-specific quantitative heat modelling.

- **Canopy figures used as heat mitigation are inconsistent.**
  EIS canopy cover is **24.7%**, while UHI advice says **29.6%**.
  Discrepancy: urban heat mitigation claims rely on canopy values that are not consistent across the pack.

- **Water-management scope narrower than SEARs issue.**
  The Stormwater/Integrated Water report states it relates to stormwater drainage and refers potable water/wastewater to hydraulic documentation.
  Gap: the broader community concern around total water demand, recycled water, cooling, irrigation, drought resilience and cumulative data-centre water use is not fully integrated in one place.

K. Infrastructure and staging discrepancies

- **Off-site telecom/fibre routes not finalised.**
  The Infrastructure Report says Goodman will negotiate with preferred telecommunications carriers during design finalisation and required routes/asset changes will be identified at that point.
  Gap: off-site works and public-domain impacts are deferred.

- **Electricity augmentation not finalised.**
  The Infrastructure Report says Ausgrid will advise final supply capacity and route options and that high-voltage network augmentation is expected.
  Gap: a major infrastructure dependency is not fully assessed before determination.

- **Construction staging relies on later sign-offs.**
  The Infrastructure Report says sign-off from relevant infrastructure authorities will be obtained as relevant, and that commissioning will occur before business-as-usual operation.
  Gap: the EIS does not provide full certainty about when/how all infrastructure dependencies will be delivered or managed.

L. Construction management discrepancies

- **Construction impacts deferred to future management plans.**
  The Mitigation Measures Table says a detailed Construction Traffic Management Plan will be prepared prior to construction and will include construction traffic generation and worker parking.
  Discrepancy/gap: construction traffic and parking impacts are not fully resolved at assessment stage.

- **Construction noise exceeds NMLs but mitigation is standard/management-based.**
  Predicted construction noise exceeds NMLs at residential, school and active recreation receivers. The SIA mitigates this through a CNVMP and communications strategy.

Discrepancy: a predicted high-impact construction environment is not matched by commensurate, site-specific mitigation.

- **Construction fatigue acknowledged but not quantified.**
  The SIA identifies cumulative social impacts and construction impacts but does not provide a robust standalone assessment of construction fatigue.
  Gap: local cumulative construction burden is not quantified.

M. Cumulative impact discrepancies

- **Cumulative impacts named but not quantified.**
  The SIA lists cumulative impacts including construction, on-site fuel/lithium battery storage, safety/security, contribution to the digital economy and urban heat.
  Gap: these are identified but not quantified across multiple existing/proposed Lane Cove West data centres.

- **Data-centre clustering used as a justification but not assessed as a cumulative burden.**
  The Engagement Report says proximity to other data centres supports hybrid solutions, backup systems and disaster recovery.
  Discrepancy: clustering is used as a benefit, but cumulative impacts of clustering — power, water, heat, diesel, generator testing, construction and employment density — are not fully assessed.

- **"Located to minimise residential impacts" vs acknowledged residential/community interface.**
  The Engagement Report says the site was selected due to zoning "to minimise impacts on residential areas." Other documents acknowledge nearby residential dwellings, the Community Nursery, Blackman Park and the C2 corridor.
  Discrepancy: the location rationale does not reflect the sensitive interface around the site.

N. Suggested "ask" to include after the appendix

Given the number of unresolved inconsistencies and cross-report gaps above, the applicant should be required to provide a **single reconciled design-basis register** before any determination. That register should identify, for each appendix, the exact assumptions used for:

- maximum height, including plant/screens/generators;
- total power demand and transformer/substation capacity;
- generator number, location and testing regime;
- total diesel volume and tank arrangement;
- lithium-ion battery quantity and location;
- transformer oil volume and containment;
- nearest sensitive receivers and measured distances;
- construction workforce and worker parking;

- operational jobs and staffing;
- tree removal, retention and canopy cover;
- water demand, reuse and stormwater reuse impacts;
- heat-rejection assumptions;
- cumulative data-centre impacts.

The applicant should then identify which reports require updating because they relied on a different or outdated assumption.