

I object to this proposal. The site is totally unsuitable for a hyperscale data centre

My reasons are as follows

The Community Nursery and C2 Conservation area

The role of the community nursery has been grossly misunderstood. It is not active recreation. It is a nursery that is quiet, propagates tens of thousands of plants for the LPA and national park and is run by workers and many volunteers. This data centre will make it impossible to continue. Lessening its importance by the developer has allowed them to grossly underestimate the impact of this development both in construction and operational stages.

Overshadowing is considered as minimal impact however the actual hours of direct sunlight lost is not quantified to justify this statement. Plants NEED sun to grow. The overshadow diagrams show only points in time and do not quantify total sunlight hours lost. This is not a luxury issue of amenity- it is critical to the very purpose of the nursery. Further:

- The impact of the dust and pollution is not addressed, and its impact on the plants
- The impact of the noise and vibrations are not adequately addressed on the volunteers and staff who work there. There is no engagement with them to find out if they would continue working, a necessity for the viability of the nursery.
- The nursery is a key mitigation method for urban cooling strategies for not just the immediate local area, but further afield. They propagate thousands of plants every month to provide a canopy and cooling mechanism. It is ironic that a key environmental mitigation tool proposed by this EIS has its very livelihood compromised by the data centre plan.
- Further to this, there is no quantifiable analysis of the heat island effect from similar data centres. The impact of heat rejection is not looked at and overall, this area is ignored, particularly in relation to the nursery and the C2 area.
- Sediment control from the construction site is ignored completely.

The area proposed for development is surrounded by conservation zoning, a narrow corridor that has not been given any attention in the impact studies. It is a narrow corridor used by animals that, by its very size, is vulnerable. It is not a convenient buffer zone to mitigate the visual and acoustic effects of this development. My street has seen echidnas use this corridor as part of their travels to other areas of the park. What flora and trees are there as part of this corridor, how will they be affected by the heat, and more particularly, how will their roots be affected by the excavating. The roots of the largest trees, both the retained trees and those in the C2 zone area will have spread many meters and be part of the excavation area. The excavation is very deep along this corridor and cannot be dismissed so easily. Fences around a TPZ are to be erected as is "the maximum practicable extent". This shows that the development, and not the trees are the main consideration and beyond reporting, there is no real penalties for tree death. In reality, if tree health is compromised, safety regulations on site will cause the removal of further trees, rather than the cessation of work. There is no guarantee that the trees that are kept will survive considering the considerable damage to the "practical root area". This has not been considered at all in the report and must be looked at.

Further to this, there is no sediment control plan. Given the sloping nature of the site, this omission is strange and needs to be rectified.

Finally, I do not understand how the thermal energy will be used to "saturate the air" thereby not affecting the "surrounding air". This development will use 510,000 kilolitres of water annually. This will increase humidity and temperature and affect all surrounding areas. Please give me more data

and information based on other data centres and how it affects the surrounds. There must be much data available now worldwide and it is surprising that this is omitted. For such a large development, there has not been a great deal of effort given the important details required in an EIS — yet I have read a lot about mulching. I am not sure how this serves to educate us about the impacts of the development. It serves only as a distraction (with a few home-gardening tips).

The nursery and C2 area must be looked at more carefully than a mere inconvenience or a buffer zone. It is far more important than that and fulfils a clearly unrecognised role in keeping our city cool and amenable for wildlife, fauna and people. The EIS must include a comprehensive description and assessment of the likely impact at all stages to **ALL** affected areas. It fails with regard to the nursery and C2 zone.

HEIGHT EXCEEDENCE

I object to the proposed Clause 4.6 Variation seeking to increase the maximum building height from 18m to 28.3m (a 57.2% exceedance). It has not been demonstrated that compliance with the height standard is unreasonable or unnecessary, nor that the objectives of Clause 4.3 are achieved despite the non-compliance.

Firstly, the variation is excessive. The attempts to downplay the exceedance by stating that the “extent of height variation is limited to a small portion located towards the centre of the site.” does not nullify the fact that it is three storeys above the LEP limit.

Appendix OO says “the bulk and scale of the development has been informed by the operational requirements of the data centre. Back up generators and mechanical plant at rooftop level are critical to the viability of the development. “ If a variation of this magnitude is necessary for viability, it demonstrates the unsuitability of the site.

A 57% variation is not minor, incidental, or consistent with the intended built form for the Lane Cove West Business Park. Further it creates a precedence for future developments to exceed the height. We will have higher and higher developments. This is already being shown by another submission for over 38 meters. This is a small, suburban business park. The height regulations are for a reason. General industrial zoning is not suitable for this kind of development, particularly when it is adjacent to parks and residential areas. The purpose of 18 meter heights should be respected.

More specifically, Clause 4.3 has four objectives. The proposal fails in the following.

3.1 Objective (a): Solar Access to Existing Buildings and Public Areas

The proposal says “the additional overshadowing... is minimal and will fall mostly on the car parking and structures associated with the Lane Cove Council Depot.” However the shadow diagrams clearly show significant additional shadowing to the east and south at 3pm in winter. The Council depot is public land with people working there and should not be treated as if it is not significant. Further the overshadowing of the nursery is acknowledged however downplayed as it is mainly caused by the substation. The cause of the shadowing is irrelevant and is merely used to distract from the critical effect of this shadowing on the nursery.

There is no quantitative analysis of hours of sunlight lost, area of public land affected and seasonal variation. Further, a claim of minimal impact to justify the variation is unsubstantiated as it is not made by the people and areas affected. It is made by the proponents to justify their variation which is not objective in any way.

3.2 Objective (b): Privacy and Visual Impacts Where Zones Meet

The site directly adjoins C2 Environmental Conservation land and is near R2 Low Density Residential areas. The applicant asserts:

“the additional building massing... will not contribute any additional visual effects...”

This is contradicted by their own photomontages and further reinforced by their lack of visual imaging that would show the totality of the buildings and their height. Such imaging is possible as they have provided an image given from the Mars Road viewpoint. All other vantage points are ignored for such treatment. The VIA is overly selective, not including Blackman Park (only 25 meters away), Lloyd Rees Drive, the skate park, highly impacted residential areas east of the sight and those houses on Wood street at the top of the valley overlooking the park. These houses, in particular, are in the direct line of sight so it is incomprehensible that they should be ignored. The claim that the building “will present as two storeys from Mars Road” ignores the fact that visual impact must be assessed from all public viewpoints, not just the most favourable one.

3.3 Objective (c): Seeking Alternative Design Solutions

The applicant provides no evidence that alternative compliant designs were explored. Clause 4.6 requires demonstration that compliance is unreasonable, not merely inconvenient.

The absence of alternatives to assess is a fundamental flaw.

3.4 Objective (d): Relating Development to Topography

The applicant claims the building “responds to the change in site levels,” yet the exceedance occurs at the highest point of the site, amplifying visual prominence.

The proposal does not relate sensitively to the steeply sloping topography or the adjoining bushland reserve. Further, the extra height will serve to amplify and broadcast acoustic impacts over a wider area across the valley. Topography is greatly underestimated in the impact of the height exceedance. It is seen as a component of mitigation however topography is one of the reasons why the site is so unsuitable. Excavating into the slope has allowed them further opportunity to increase the size of the development. It has not been used to lessen the height. If so, this variation would be unnecessary.

4. Environmental Impacts Are Understated and Unsupported

As previously written, the environmental impacts are underestimated and the fact that it borders with conservation area is largely ignored. The substantial increase in height further magnifies these impacts. Shadowing, visual, air and acoustic impacts are all magnified because of the sheer scale of the project which is magnified because of the increased height, particularly the visual impact. This magnification cannot and should not be ignored or dismissed. Comparison to compliance within the 18 metre allowance is not studied at all.

A selective VIA cannot satisfy Clause 4.6.

In summary, the height limit for this zone is important as it borders on parkland and residential housing. The business park must run with compatibility with its nearby zoning neighbours. This is in the public interest. The current existing height limit serves to:

- protect environmental conservation land,

- maintain reasonable visual amenity, ensuring industrial development does not dominate the landscape
- ensures consistent application of LEP controls

Approving a 57% height exceedance would set a dangerous precedent for the Lane Cove West Business Park and undermine the integrity of the LEP.

SOCIAL IMPACT ASSESSMENT (SIA) is fundamentally flawed

The SIA prepared by Urbis assesses the social impacts of the proposed Mars Road Data Centre claiming to follow the DPHI Social Impact Assessment Guideline (2025).

The SIA runs on faulty assumptions and methodology and its conclusions are incorrect.

1. Firstly it is not an independent and objective study as claimed.

It is prepared by the same consultancy (Urbis) that prepared other reports including planning justification, engagement report, and Clause 4.6 variation. This is a clear conflict of interest. There is no independent peer review, no community validation, and no evidence of impartiality. As a result, it is simply not credible.

2. The SIA Minimises Impacts by Systematically Rating Them “Negligible”

The SIA repeatedly assigns “negligible” or “low” ratings to impacts that are clearly significant, including Blackman Park amenity, visual impact, (negligible to low positive), air quality impacts, environmental values (negligible to low positive). There is no evidence to substantiate these ratings. These ratings are contradicted by the height exceedance (28.3m), diesel generator emissions, 24/7 operations, vegetation clearing and proximity to a school, nursery, and major park. They are all assessments to justify the proposal, not to inform.

3. The SIA Relies on a flawed Engagement Report

The SIA draws heavily on the Engagement Outcomes Report, which was minimal, selective, non-interactive and lacking participation data. The community feedback foundation is therefore unreliable. Discussed in another area of this submission.

4. The SIA Fails to Identify Key Socially Impacted Groups

The SIA claims to identify “different social groups likely to be affected,” but many are missing: This includes many Blackman Park sporting clubs and schools, dog park users, parents and children using the playground and skatepark, Lane Cove West Public School families, Bushcare volunteer, CALD communities (38.8% speak a language other than English) and residents beyond the immediate streets. There is little to no engagement tailored to the affected people described (dealt with in another area of my submission).

These groups are directly affected by noise, visual bulk, air quality, traffic, and loss of amenity and their exclusion is a major methodological failure.

5. The Social Locality Is Defined Too Narrowly.

The locality is defined around the immediate industrial area, excluding Blackman Park’s regional catchment, school communities who use the park and recreational users from Riverview, Hunters Hill, Lane Cove North, and Gladesville. Blackman Park is a regional facility, not a small local park

being one of the largest on the north shore. By narrowing the locality, the SIA artificially reduces the scale of social impact.

6. The SIA Downplays Health and Wellbeing Impacts

The SIA rates operational noise as “negligible”, despite 24/7 operations, diesel generator testing, mechanical plant on the roof and proximity to homes, a school, and a nursery. It also rates air quality impacts as “negligible”, despite diesel combustion, backup generator emissions, cumulative industrial emissions and proximity to children’s recreation areas.

There is no health risk assessment, no modelling of exposure, and no analysis of vulnerable groups particularly the thousands of children who play sport and use the recreational grounds. This is contrary to its own reports which conservatively admit to exceedances in construction noise and borderline levels to sleep disturbance. The SIA is consistent in downplaying impacts which is convenient but not accurate.

This development will be a permanent fixture and machinery will become less efficient with time so the effects on these groups will increase, particularly children. There is no alternative place for these groups to go. The irreplaceability of this park on these groups is grossly underestimated and should be accurately re evaluated.

7. Visual Impact Assessment Is Unsupported and Implausible

The SIA claim that the potential visual impact is negligible to low positive” is plainly ridiculous.

The building exceeds the height limit by 10.3m, it is visible from Blackman Park, the skatepark, and the nursery and it introduces a large industrial mass into a recreational landscape

The SIA provides no visual analysis, no imaging of the whole development, only one small part from Mars Rd, and no community perception data. This claim is so fundamentally flawed that it should not have been part of the EIS. It is of course linked to the fundamental flaws in the community engagement, whereby the community was not given a good understanding of the totality of the development visually. They were only informed at the early stages of developmental planning.

8. Cumulative Impacts Are Acknowledged but Not Assessed

Cumulative risks are acknowledged only. There is no rigorous assessment, mitigation or detailed discussion. This is a key flaw and leads to the presumption that this proposal wants to be approved only on its individual merits which, given the circumstances, is impossible. Cumulative impacts are vitally important because the concentration of data centres in Lane Cove West is well known. There is another one proposed in the immediate vicinity that is another fifty percent bigger again, with a height exceedance of over double. The on-site diesel and lithium battery storage, security, contribution to urban heat, pollution, construction noise and dust, vibrations, cumulative operational noise should all be looked at in conjunction with the existing, approved and proposed data centres, all within a 500 meter distance (and mostly a lot less). This should be a detailed assessment because it is a fundamental flaw to this whole planning process. Further, mitigation should be more than just generic statements. These developments will have PROFOUND impacts to the surrounding communities, child care facilities, recreational land and bushland in a fire prone area. For this issue to be so ignored in a SIA is extraordinary. It is totally inconsistent to the requirements of an SIA.

9. The SIA Overstates Economic Benefits

The SIA claims “high positive” employment impacts during construction.

But data centres create very few ongoing jobs, construction jobs are temporary, most specialised roles are not local and there is no evidence provided for local hiring. In fact the loss of jobs for the area far exceed the jobs gained however this is omitted from the report.

10. The SIA Does Not Demonstrate That It Informed the Proposal

The SIA claims “the SIA process intends to inform the Proposal...”. There is no evidence that the design changed, impacts were reduced or community concerns influenced the input into the design. The SIA is a post-hoc justification which is natural as much detailed information was not given to the community in the first place to credibly assess the social impact both of this one project, and the cumulative effects of Lane Cove West becoming one of the largest data centre clusters in NSW.

How this would impact the reputation of Lane Cove as “most livable community” in Australia, would have been an obvious start to this assessment.

COMMUNITY ENGAGEMENT WAS TOTALLY INADEQUATE

I was fortunate enough to take part in the community engagement from the beginning and I actively participated whenever I was given the opportunity. I was somewhat surprised to find the Exhibition announced with details that I would have liked and had no opportunity to engage with. The Engagement Report (Appendix E) was of particular interest to me.

As background I looked at the engagement approach which outlined the strategy of Urbis and here I found the fundamental flaw in this report which negates any conclusions that can be drawn from it. In section 3.1 Urbis say

“The engagement approach has been determined based on the anticipated level of impact of the project on the surrounding community” as informed by the “Engagement Institutesand DPHI’s Community Participation Plan”. Urbis predetermine that the level of impact is likely to be “low to moderate” and thus the objective of the community engagement was to “inform and consult” stakeholders.

Despite the project’s scale, proximity to homes, a primary school, conservation areas, a community nursery and Blackman Park (a major north shore recreational park and playing grounds) , Urbis classified community impact as “**low to moderate**”. This is an unsubstantiated justification used to limit engagement to the lowest rungs of the IAP2 spectrum: *inform* and *consult*. It does not allow for “active engagement” as is required by the EIS. It creates a circular argument whereby the low to moderate impact classification informs the type of engagement which in turn informs the justification of low to moderate impact. Original survey material would have informed Urbis that this assumption was incorrect.

More specifically when participants responded to a survey

- **85.7% anticipated the proposed development would negatively impact the community.**
- **When asked about positive impacts 87.2 % could think of none (76.9%), or needed more information to think of any (10.3%)**
- **When asked how negative impacts could be avoided or reduced, 65.8% said moving it to a different location or not build it at all.**

These answers totally contradict a “low to moderate” justification for limiting community engagement.

Further to this Urbis fails to inform, a key tenant in their own chosen methodology.

- Key stakeholders were given little information about the specifics of the development that might concern them. These specifics have in fact been kept from the community until this exhibition. This final notification is not engagement.
- the timing of the Exhibition has been over Easter and public and school holidays which has meant that many people have been away and are less likely to be engaged at this late but crucial stage
- Consultation was selective and key stakeholders were not made aware of the final design or given notice of the exhibition. Key stakeholders in the early stages included representatives of a small selection of sporting clubs. Many clubs were not included and there was no engagement with actual users of the sporting facilities at the park. Instead, there was total reliance on these few representatives to inform their greater community. There are no documents to substantiate that this was ever done. This is a grave methodological error considering the thousands of people who use the recreational facilities.
- Community awareness of the final design has had to be promoted by the community itself, at their expense, with no help from the proponents. A public meeting offer made by council was turned down by the proponents and there has been no engagement at a holistic level with the community so they can better understand the detail of the development.
- The sheer scale of the ignorance of this development by so many users of the park, neighbouring houses and businesses clearly demonstrates the flawed processes used by Urbis. This was compounded by the early nature of the consulting, when little detail could be furnished.
- On a personal level, I was part of the drop in consultations and while my concerns were noted, they could only be generic in nature as no one could give me any substantial detail. I found the meeting to be a waste of my time as I wasn't really furnished with any new pertinent information. I was told, as the engagement report notes, that various assessments have been completed and would **"inform the State Significant Development Application.....and will be available as part of the Public Exhibition."** This demonstrates the active removal of the community from engagement with the developmental process and is contrary to the most basic of EIS requirements. It was my understanding that community consultation is meant to inform this process and not be at the end stage. Informing by way of an SSD that is over 3,000 pages long in its entirety, with no community meetings to explain the development in full is ambitiously trying to negate community involvement not encourage it.

Other shortcomings

- Key groups were overlooked entirely including major user groups of Blackman Park, parents of schoolchildren, environmental groups, bushcare and community nursery employees and volunteers and residents beyond the immediate streets—despite the project's regional impacts. Because of this, it has allowed the proponent to minimise dissent by simply not talking to the many people most affected.
- Demographic data included—but never used. The report provides a detailed demographic profile—age, languages spoken, education levels—but there is no evidence this information shaped the engagement strategy. No translated materials. No culturally tailored outreach. No child- or family-focused engagement.

Community consultation guidelines stipulate that "community is provided with a good understanding of what is proposed, including a description of any potential impacts. We cannot be

engaged when we are not fully informed. Overall, for a State Significant Development, this is far below both an EIS and community expectations.

In summary, the lack of community consultation will no doubt be evidenced by how many submissions you receive on this proposal and indicative of just how successful the community engagement by Urbis was. The impacts of developments such as these are huge and irreversible. It is easy to get blinded by perceived rather than real economic value. I have yet to see a fully articulated economic argument for why a data centre such as this is a good idea in a small suburban business park. It does not bring long term investment to the area. Clusters of data centres causing the crowding out of small businesses will not bring a vibrant, resilient business community to the city. It causes a net loss of precious, irreplaceable spaces.

Other Issues – Noise Vibration Impact Assessment

Particulars from the NVIA were not available until now. This document acknowledges that without mitigation, the impacts will be high negative with periods of high exceedance. It downgrades this to medium negative on spurious grounds of mitigation with no guarantee that any will be effective - for example, using equipment that is minimum sized, silenced or dampened where possible. However there is acknowledgement that rock breakers will be necessary and that substantial excavation work will need to be done over a long period of time. To use machinery of minimum sized is clearly not possible and a realistic impact study of the equipment necessary should be done, including the acoustic effects of the stated equipment and the nature of the work. The geotechnical study shows at significant amounts of bedrock need to be excavated so this information would be able to be estimated. How a school is expected to operate with noise impacts close to exceeding limits (modelled on smaller equipment) must raise many questions.

For noise during operation to be classified as negative does not fully take in the quiet of this neighbourhood. We have background noise, planes, traffic and the current industrial estate however all this background noise has substantial periods, particularly through the night and early morning, when it is exceedingly quiet. The loss of this to a minimum standard of what a report considers negligible ignores the true impact of this loss to the community. Further, there is no guarantee that it will be negligible. How it could operate in extreme circumstances, heat waves etc is not truly considered. Once built, there will be no way of reducing any noise exceedances caused by operations or future exceedances caused by a lack of efficiency due to wear and tear or climatic conditions. This is why this location is not suitable for a data centre. It is too close to sensitive areas that will be permanently affected.

There is no NVIS for when all diesel generators are in use. The justification is that this will rarely happen. This is actually unknown and should be more carefully studied for a longer period. The cumulative load on the electricity system with the cluster of data centres in this area drawing on the power load is not adequately discussed and the potential of both more frequent loss of power and for longer durations. Furthermore, a cumulative impact study including the diesel generators already installed/approved in other local data centres must be studied. The cumulative impact on noise, vibration and pollution are essential for an accurate EIS

The acoustic reports are misleading, inadequate and even omit inconvenient data. Sensitive receivers have not been placed in key areas. Many houses along Wood St, Banksia Close, in the business park and Blackman Park have not been given appropriate attention, and many instances have been ignored entirely. That Blackman Park (NC06) should not be included in noise impact

tables demonstrates the inadequacy of this reporting. It is only 25 meters away at its nearest point, and the skatepark and playing fields are in the immediate vicinity. The topography of the area indicates that houses positioned higher up on Wood St would be greatly impacted but are not part of the study. Also houses in Banksia Close and on the west side of Avalon Ave, whose gardens face the direction of the industrial area will be affected to an extreme degree by the construction and then permanently by the operational noise.

It is most interesting that we have not been given the time or the resources to do an independent noise analysis. This has a crucial and permanent impact to the community and if the proponent is so confident that there is minimal impact, they should be confident of a report directed by the community. It will negate much community concern. The omission of this opportunity is telling. Given the scale of the development, it cannot be due to a lack of financial resources. I can only assume that it may be inconvenient and inconsistent with their assumptions.

LOCATION

The significance of the site being close to Blackman Park, adjacent to conservation land and near residential areas is downplayed. The closest residential block is about 16 metres away. There are many more houses that back on to the area with minimal buffer zone. The impact on the amenity of these houses is incalculable together with their very real actual economic value. This is too high a price for residents to pay and why should they. There is no compensation for the fact that they pay the very real costs of such an inappropriate development. The Goodman Group however save money by choosing an area that has infrastructure they can use. This company owns more appropriate sites and the company's viability is in no way affected by leaving this site to the SME's that are there now. One company will profit at the expense of many. This is not a fair way to conduct planning in NSW. Costs should not be socialised and Goodman should know better. They are successful and financial enough to make decisions that consider environmental and social impacts of their enterprises. It is sad that a big multinational is happy to compromise the viability of SME's, irrevocably damage the amenity of recreational and conservation parkland, and ruin the amenity of so many homes just on a singular business proposition. This development should never have been proposed in the first place.

Mission Critical

This data centre is classified as "mission critical" and as such must operate in accordance with contracted business arrangements in the event of a power failure, crisis or catastrophic event". This means that energy, water and fibre optic cables will be prioritised over residential needs at all hours of the day and night. Lane Cove West has already had many disturbances, sometimes in the middle of the night as repairs are made to support the current data centre operating. The residents are second to the needs of these operations which is another reason why the location is totally unsuitable. Mission critical infrastructure should not be near residential land. This proposal should not be assessed in isolation, but with the cluster in this area, and the inability of a small business park to cope with mission critical infrastructure acknowledged.

Further to this, the security is minimal, hazardous materials are plentiful and the whole area could be a target to terrorist activity in the future. This would be catastrophic for the community and the environment. There is no information as to who the tenant will be, and whether this data centre could become a target, especially as many American technology companies and AI are, and will be the cause of so many job losses. Sovereignty cannot be a reason to approve this development because there is no guarantee it will be used wholly and entirely for the Australia's benefit. This may

seem a trivial issue, but looking at it, especially as part of a data centre cluster, is crucial. Any disaster would make the surrounding area uninhabitable for an extended period. Note that in war time data centres are one of the first pieces of infrastructure targeted – not just for its disruption capabilities, but also for the large amounts of diesel and lithium battery load.

Currently, there is not even a plan in place for such possibilities. This demonstrates how general industrial planning laws are simply not catching up to real life planning. Data centres should be under a different planning category and not part of general industrial at a suburban business park. This particular data centre has no security except a camera. This is hardly effective. Due to the few people on site, this would pose a huge fire risk also.

Lack of Detail regarding Infrastructure Support

There is no detail as to how this development will be supported by Energy Australia, Sydney Water and the current data fibre optic cables. The water requirements are specific and great. The EIS says that it will use water that has been allocated to the business park. This is misleading as it implies that the park has a specific allocation that these requirements are contained within. This is not true. The water needed must be accessed over and above what is supplied now. Full details should be known by the community and stated in the EIS before approval is given. Because of its mission critical nature, these resources will be directed to the data centre and the impacts to the community need to be acknowledged. Lane Cove West have already experienced over 18 months of major roadworks for another data centre that did not specify the necessity of these works in their own proposal. Our roads and footpaths have been dug up, and many areas are hazardous to people, bicycles and pedestrians. The nature strip damage in some areas has never been rectified and the contractors have disappeared. This lack of transparency is what causes residents to cease trusting the governments who approve large developments. Further, neither the council, nor us have control over these added works and rejuvenation is PAID BY US if not done properly. Once approval is given there is little appetite to protect residents from the excesses, undeclared impacts and plan changes that follow. Goodman should fully declare what is needed to provide the necessary inputs to this development considering the huge amount of water and electricity needed.

Air Quality Assessment

It systematically underestimates emissions, misidentifies sensitive receptors, and fails to assess cumulative impacts.

Firstly, the AQIA is not compliant with SEARS requirements which require peak, not minimal emergency scenarios. A one hour window is not representative of real time situations. Our local shopping area recently had an outage that lasted over two days. With the increasing heat wave conditions, the degradation and retirement of coal fire power stations, it is becoming increasingly difficult for the grid to keep up with usage. It is therefore a minimal requirement to model multi hour, multi day and heatwave conditions, where the air quality is often reduced.

Emission output during normal operation is taken at a lower energy output than maximum published. It is very hard to understand reports, as to what operating conditions the modelling is done – what are usual conditions and at what daytime temperature does energy output change. Is it at 24 degrees or 30 or 35. Considering the changing climactic conditions, this should be clearer. This affects not only air pollution, but also acoustics and vibration and is essential information for the community to understand. Also, importantly, by its own admission air quality studies can be $\pm 10-40\%$.

Sensitive receptor areas are not properly represented. As in much of the report, the proximity of sensitive receptors is underestimated. The closest house is 16.5 meters away and Lane Cove West school is represented in the Table 1 of the Appendix as 300 meters away. It is almost half this distance with over 500 children and teachers being **within** the 250 metre zone. Blackman Park and the thousands of children that use this area do not get a mention, a major flaw. Because of the incomplete nature of this data, and its material misrepresentation, dispersion data is flawed.

Appropriate representational meteorology is also necessary. Sydney Olympic Park is not a good comparison. The site sits on the edge of a small valley which is materially different. The risk of stagnation of air and generally sheltered topography, particularly of the playing fields is not taken into consideration.

The generator testing modelling is not accurate. It says it is conservative, but actually is has been presented in a way that is artificially low. Only the minimum hours are noted, if the generators are essentially working. Warming up times, when more power is required and emissions are at their peak is not modelled. Morning inversion periods are not modelled, when pollution is most likely to affect the Blackman Park basin, and multi day testing is not modelled. Approved methods must model worst case scenarios, which has not been done. The most convenient worst case scenario, where generators are used minimally only is looked at. The AQIA thereby actively underestimates NO₂ and PM2.5 during routine testing which is a serious flaw given the proximity of many children.

The most serious flaw however is the complete lack of assessment of the cumulative impacts. It lists one industrial neighbour who has not been here for 6 years which shows the perfunctory nature of the report without any proper due diligence. This might be a positive except that the rest of the report is so flawed that such an error is really not a surprise.

Firstly, the AirTrunk data centre is noted but not its size or how many diesel generators it has now or will have once its extension is complete. I believe it will be close to 140. There is also another data centre on the same road that has been approved. How many diesel generators will it have? There is also another data centre beside this one which is one and a half times bigger again. What are the implications of this? If there is an electrical emergency, the likelihood of all data centres being affected simultaneously is very high. If you are going to be part of a data centre cluster, you cannot expect to be assessed individually. Understating cumulative impacts runs counter to EIS requirements.

Macquarie Park is also used as a base line and shows that particulate matter is elevated and that background mitigation measures need to be implemented during construction and operation so that there is no contribution to exceedances. In conclusion however this report says that installation of pollution control devices on generators is not deemed necessary. This is an extraordinary conclusion and must be refuted.

The poor quality of this EIS document is completely disrespectful to the impact on people's lives and livelihoods.

The NSW government needs to understand the cumulative impact of such developments before any data centres are approved. This AQIA is further proof that data centre developments are trying to rush through their proposals with inferior reports such as this, before regulation catches up. However SEARS still requires a minimum standard which clearly has not been met here. Further it requires assessment of health impacts, not just pollutant concentrations but also chronic exposure and vulnerable populations which would include the thousands of school children affected.

Strategic Planning Alignment

This proposed development does not show any strategic planning alignment with State, district or local strategic plans. It actively works against them and the SPA documentation is flawed and relies on circular assumptions that serve a self fulfilling purpose. For example

Objective 22: The proposal will provide a significant investment within the industrial park.

This is misleading as investing in the current buildings for the current tenants will do the same thing, with the added advantage of having a net positive effect on employment opportunities. This proposal causes a net negative effect with the loss of up to 200 current and long term jobs. Construction jobs to build it are short term only. This significant investment is merely a sugar hit of construction, with no guarantee that any of these jobs will be local. The long term impact to the area is categorically negative.

Objective 23: the industrial area means that sensitive receivers and non compatible land uses are located at a distance and adequately separated or screened.

This is categorically false. It is unfortunate that The Goodman Group own a piece of land that is very close to sensitive receivers. The closest residential block is only 16.5 metres away with other residences between 50-100 metres. Conservation C2 zoning is directly adjacent also on two borders. There is even a primary school that is consistently categorised as being further away than it is. There is also no acknowledgement of the sensitive receivers who are further away but who are impacted due to the topography.

The **current** building regulations and height restrictions allow this land to be used in a compatible way with sensitive receivers. Goodman wish to change these restrictions which will cause irreparable harm to all these sensitive receivers. The regulations should be respected and the SME's in the area allowed to stay. As business parks get swallowed up by data centres, it is important that some land is retained for our smaller businesses.

It is truly amazing that Goodman should publish this objective as they so clearly do not honour it.

North District Planning Priority 11 highlights “the importance of safe-guarding industrial lands in the north as there is a limited supply.

This is a reason to NOT have a data centre built here. Safeguarding the site by replacing many businesses who do not have economic power with one powerful business is not a safeguard. The Planning Department should be safeguarding the SME's who employ many. This is one powerful business whose business plan, not only employs only 26 long term, but compromises the viability of many. Again, it is surprising that this is incorporated into a justification when it is so clearly inconsistent with Planning Priority 11 in all respects.

The Local Strategic Planning Statement – Planning Priority 7 to “facilitate location of a diverse range of retail, commercial and industrial businesses in Lane Cove

I do not understand why this too has been included when the development so clearly does the opposite. Introducing a high-technology industrial use company is one commercial business and reduces employment opportunities. It runs counter to the LSP completely.

In relation to the Better Placed initiatives, the responses are generic, unsubstantiated and determined by the proponent, not an independent body. There are many instances where reports

run counter to the Better Placed initiative, but these areas are ignored, glossed over or misrepresented.

Better Fit

The proponent says that the design makes a positive contribution to the streetscape, neighbourhood and neighbouring sites, in scale and height. This self determination is extraordinary. No one external to this process has even been asked, especially the community, who are the ones affected. The scale and the height are dismissed as positive, but Goodman has not done a single graphic representation of the whole development from all angles. This pronouncement alone leads me to understand the lack of effort that has gone into the EIS. I am surprised that it is so unprofessional. The inference is that they wish the proposal to go through without scrutiny.

There is an overreliance on the primary street frontage however this is the side that will have the smallest significance. It is at the end of a cul de sac with little traffic. The east and south sides in particular are very important to the amenity of residents and park users but are ignored. The inclusion of green site edges is minimal compared to the number of mature trees being destroyed and the amount of excavation needed which will affect the root systems of the existing mature trees. There is no guarantee that they will even survive the massive excavation necessary.

Better Performance

This objective emphasizes sustainability, which considering the huge amounts of water and electricity that must be sourced to maintain it, is an objective best left ignored. Energy efficient systems are needed of course to even sustain this development such is its huge need for resources but it is not a proposal that can ever have a small carbon footprint. There appears to be no facility to retrofit if better systems are found. This is a proposal with a huge carbon footprint. It is not clear how the huge electricity and water needs can even be met. A more sustainable option would be to renovate the existing buildings.

Similarly, adaptability is not addressed at all, as, when technology moves on, as it is sure to. How will this building be fit for purpose for another use. Future floorplate configuration would be limited by the data centre. The current buildings however are more sustainable and much more adaptable and if renovated for SME's will fulfil the objectives of sustainability and adaptability much better.

Better for Community

“The proposal provides an essential social and community infrastructure asset that facilitates (digitally) the core ideas of social community connection and inclusivity”

I am sorry but I can't even dignify this with a comment. The community spoke in the social impact statement with over 85.7% responding negatively. This is just a large motherhood statement of little meaning and is insulting to both the community and to the spirit of these guidelines.

Better Working

I agree the proposal has been designed to be highly functional, efficient and fit for purpose. I would expect this for the proponent to maximise the value of his asset. Unfortunately to be all of these things, current building regulations must be broken which rather negates this better working ideal.

Better Value

Again the “clear employment and economic benefits” are not fully explored – probably because there are difficult to ascertain. The employment benefits are spurious. Definitely not long term

benefits, and as to the short term, I would have thought construction resources were best directed at residential housing right now.

Better Look and Feel

What on earth does “environmentally performative” mean. I think the writer of this is now tiring, as I am. I will agree that the building façade to Mars Road is “deeply articulated” but am unsure how introducing “porosity and modulation” reduces the scale of the buildings behind it, as they are not shown in the imaging. Generally, lots of piffle.

In conclusion to this report, the Justification Summary states the main reason for this proposal is “its access to infrastructure”, the only truly correct statement in this section. It is obviously much cheaper than building new infrastructure, the building of which would be more beneficial to the state. In no shape or form has it complied to the strategic planning guidelines whether it be State, district or local. It has not considered the wider locality and has actively disengaged from considering the cumulative impacts with other projects. This is a fundamental weakness of the EIS and thereby fails to meet the standards of completeness and accuracy. Furthermore, the stated series of feasible alternatives needs to be taken on trust as no detail is given to question this. Finally the declaration that it is aligned with the relevant State and local strategic planning policies is simply non sensical. It is an own goal in self delusion that sets the tone for the rest of the EIS.

This is not a suitable location for critical data centre infrastructure. There are far more appropriate locations within the Goodman portfolio and The Goodman Group should focus on these.