

SUBMISSION IN OPPOSITION

State Significant Development Application SSD-82052708

Project Mars Data Centre | 12 Mars Road, Lane Cove West NSW 2066

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Date: 19 April 2026

Submitted to: NSW Department of Planning, Housing and Infrastructure

1. Introduction and Standing

I am a resident of Cullen Street, Lane Cove West NSW 2066, situated approximately 350 metres to the east of the proposed data centre at 12 Mars Road, Lane Cove West.

I strongly oppose the grant of development consent for State Significant Development Application SSD-82052708 ("Project Mars"). This submission is informed by a detailed review of the Environmental Impact Statement (EIS) dated March 2026 and the following technical appendices: Appendix N (Visual Impact Assessment), Appendix T (Air Quality Impact Assessment), Appendix U (Noise and Vibration Impact Assessment), and Appendix X (Integrated Water Management Plan).

This submission must be read in its proper context. Residents of Lane Cove West Business Park are not being asked to absorb a single data centre in isolation. Since the EIS for Project Mars was lodged, the full picture of data centre proposals for this precinct has become significantly more alarming. There are now five data centres either operational, approved, or in planning within the Lane Cove West Business Park, a small area proximate to local schools, residences and natural settings.

In total, the Centres will have a combined total capacity of at least 395MW:

- AirTrunk SYD2 — 1 Sirius Road — 120MW — operational;
- AirTrunk Apollo Place — 1 Apollo Place — 45MW — planning approved, construction not yet commenced;
- AirTrunk Mars Road — 3–4 Apollo Place and 87–91 Mars Road — 140MW, approximately 120 diesel backup generators, five storeys — at initial planning stage (SEARs stage), with Lane Cove Council already noting the proposal "significantly breaches the maximum permissible height standard;"
- Goodman Project Mars — 12 Mars Road — 90MW — currently on public exhibition (this application, SSD-82052708); and
- DC Alliance — 16–20 Mars Road — MW capacity unknown — at initial planning stage, progressing through the NSW Investment Delivery Authority (IDA) with no public documents currently available.

If all five facilities are built, the Lane Cove West Business Park will contain at least 395MW of data centre capacity within a single industrial precinct that shares a boundary with low-density residential homes, a public primary school, a community

nursery, and Blackman Park. The total number of diesel backup generators across these five facilities has not been publicly quantified, but the three AirTrunk facilities alone would involve a very large generator fleet, and Project Mars adds 49 more. The 140MW AirTrunk Mars Road proposal is reported to involve approximately 120 diesel backup generators on its own.

Residents of Cullen Street and the surrounding streets have already lived through years of disruption, noise, and infrastructure works associated with the existing AirTrunk SYD2 facility. Air Trunk itself appears to have shown complete disregard for the impacts of these activities, with a glaring absence of any meaningful engagement with the community or attempt to mitigate the impact.

That lived experience is the baseline against which Project Mars must be assessed — not a hypothetical clean slate. The cumulative impact of five co-located hyperscale data centres on noise, air quality, traffic, water demand, power grid stability, and community amenity is, in my submission, detrimental for this neighbourhood and has not been rigorously or honestly evaluated in the EIS.

The EIS for Project Mars addresses cumulative impact in only a limited and inadequate way — and it is already out of date. The Noise and Vibration Impact Assessment (Appendix U, SLR Consulting, February 2026) considers only AirTrunk SYD2 and Apollo Place in its cumulative assessment. The Air Quality Impact Assessment (Appendix T, SLR Consulting, December 2025) considers only those same two facilities, rating the cumulative air quality risk in the emergency scenario as potentially “significant” for both — yet no combined modelling was conducted. Critically, neither assessment accounts for the AirTrunk Mars Road 140MW proposal (with its approximately 120 generators) or the DC Alliance proposal at 16–20 Mars Road, both of which emerged around the same time as this EIS was lodged. The cumulative assessment baseline used in this EIS is therefore already incomplete and materially misleading.

I request that the Secretary of the Department of Planning, Housing and Infrastructure refuse this application, or in the alternative impose conditions of consent that comprehensively address the serious deficiencies in the EIS and protect the amenity, health, and safety of the surrounding residential community.

2. Description of the Proposed Development

The Goodman Group (Goodman Property Services (Aust) Pty Ltd) proposes to construct and operate a 90MW hyperscale data centre at 12 Mars Road, Lane Cove West. The key features of the proposal as disclosed in the EIS (March 2026) are:

- A three-storey data centre building with a total gross floor area of approximately 21,832 m² and a maximum building height of 28.3 metres — a height that exceeds the Lane Cove LEP 18m height limit by 10.3m (a 57% exceedance), requiring a Clause 4.6 variation to the development standard;
- 24/7 continuous operation, 365 days per year;
- 49 low-voltage diesel backup generators (44 × 2.8MW, 4 × 2.2MW, 1 × 600kW), all located externally on the roof level of the development, to be tested for 122.5 hours per year at 100% load;
- Diesel storage tanks (approximately 1,049,000 litres of diesel), water tanks, and electrical substations on-site;

- An estimated annual on-site water consumption of approximately 510,000 m³ of potable water for cooling;
- Demolition of all four existing buildings and 67,410 m³ of bulk excavation (cut) for the building pads;
- Removal of 90 trees on the site, with 104 replacement trees — a replacement ratio of only 1.15:1; and
- An estimated development cost of \$798 million, generating only 26 permanent operational jobs upon completion.

The closest residential properties are only 50 metres to the east of the site. Lane Cove West Public School is approximately 160 metres to the north-east. Construction is proposed to commence with a 24-month program, encompassing demolition, bulk excavation, structural works, and fitout.

3. Noise Impacts — Inadequate Assessment, Speculative Modelling, and Unassessed Emergency Scenario

Noise is the most significant and enduring impact that this development will impose on residents of Cullen Street and surrounding streets. Having reviewed the Noise and Vibration Impact Assessment prepared by SLR Consulting (Appendix U, 16 February 2026), I submit that the assessment is fundamentally deficient in the following respects.

3.1 The Assessment is Entirely Speculative — No Tenant is Committed

The SLR noise report explicitly states that “the proposal is a speculative development with no tenants committed” and that “several assumptions have been made regarding the future tenants and likely sources of noise.” It further acknowledges that “the potential impacts and requirements for mitigation would be reviewed during further acoustic assessments completed during detailed design when tenant requirements are known.”

The Department is being asked to grant approval for a 90MW, 24/7 data centre operation whose acoustic profile has not been confirmed and will only be resolved after consent is granted. This is not an adequate basis for assessment. The Department should require a committed tenant and a verified plant schedule before any consent is granted, to ensure the noise assessment reflects actual operations rather than aspirational modelling assumptions.

3.2 Construction Noise — Moderate to High Exceedances at Nearest Residences

The SLR report predicts moderate to high exceedances of the construction Noise Management Levels (NMLs) at the nearest residential receivers (NCA01–NCA04) during the noisier construction scenarios, including vegetation clearing, demolition, earthworks, and hard rock excavation. Critically, the report predicts that noise levels at the nearest residential receivers in NCA01 to NCA03 (which include properties directly east of the site) will exceed the “Highly Noise Affected” NML threshold of 75 dBA when the noisiest equipment — particularly rockbreakers — is operating close to those receivers.

The report also predicts minor to moderate exceedances at the Community Nursery on the eastern boundary, and minor exceedances at the Lane Cove West Public School during the hardest rock excavation phase. Given the 67,410 m³ of cut proposed across the site, rock excavation is not an incidental activity — it will be a sustained and significant component of the construction program. The Department must impose strict conditions on construction hours, continuous monitoring at NCA01 and NCA02, and an independently audited Construction Noise and Vibration Management Plan before work commences.

3.3 Operational Noise — Compliance Only With Mitigation, and Emergency Scenario Unassessed

The SLR report finds that, with mitigation measures in place, operational noise is predicted to comply with Project Noise Trigger Levels (PNTLs) at all receiver locations during normal operations (OP.01) and generator testing (OP.02). However, the following significant concerns remain.

First, compliance is contingent on the implementation of specific mitigation measures — including rooftop acoustic screening, specified generator enclosures with attenuators, exhaust silencers, and acoustic louvres — all of which are described as “indicative” and to be “reviewed during detailed design.” The Department should require these measures to be fully specified, independently verified, and certified as conditions of consent, not simply committed to in principle.

Second, and critically, the emergency generator scenario — in which all 49 generators operate simultaneously due to a grid power failure — has been explicitly excluded from the noise compliance assessment. The SLR report states: “Operation of backup generators (outside of maintenance/testing) is only expected to occur during an emergency where mains power to the development is lost. It is not considered reasonable for the development to be required to meet the operational noise criteria during this infrequent emergency scenario and it has not been assessed further.” No acoustic modelling of 49 generators running simultaneously at full load has been conducted or presented. Given that the same grid failure event would simultaneously trigger AirTrunk SYD2’s generators only 500 metres away, the combined noise impact on nearby residents in this scenario — which is not hypothetical but historically documented in the Lane Cove West area — is entirely uncharacterised.

3.4 Tonal and Low-Frequency Noise — Persistent Character Not Adequately Addressed

Data centres generate a persistent, 24-hour low-frequency and tonal hum from cooling towers, air-handling units, and generators. The NSW Noise Policy for Industry (NPfI) provides for a 5 dB modifying factor correction for tonal noise and a separate correction for low-frequency noise. The SLR report acknowledges these correction provisions (Section 3.3.4) but the application of tonal corrections in the operational noise modelling cannot be independently verified from the information provided, as the specific equipment selection is not confirmed. Given that data centre cooling equipment is a well-documented source of tonal noise, the Department should require independent acoustic testing of actual operating equipment once installed, with a binding obligation to achieve compliance within a specified timeframe.

3.5 Topography Makes Noise Impacts Worse Than Modelled — Only 3 Properties Acoustically Tested

Council's submission identifies a significant topographical factor that the noise assessment has not adequately addressed. Council notes that "the low density zone sits within a valley and along a ridge line, this valley slopes up from the subject site and towards the residential properties." Noise generated at the site will therefore travel uphill toward the residential zone, which can increase propagation compared to flat terrain modelling assumptions. This is directly relevant to the accuracy of the predicted noise levels at NCA01–NCA03.

Council further identifies that only three properties have been subject to acoustic testing, and calls for testing locations at each individual dwelling house across the affected ridge and valley, noting that "the ridgeline and valley varies throughout this area." Council has identified a substantially larger group of properties requiring individual acoustic assessment (including properties along Banksia Close, Wood Street, Cullen Street, and Yethonga Avenue). I endorse this assessment and submit that the noise assessment cannot be considered adequate when it has tested only three receptor locations across a variable topography that includes dozens of directly affected homes.

3.6 Acoustic Louvre Design May Reflect Noise Toward Residential Zone

Council raises a specific design concern that has not been addressed in the noise assessment: the acoustic louvres on the rooftop "appear to reflect noise into the higher points of the proposed development along the western boundary and then back toward the low-density residential zone." If correct, this would mean that a mitigation measure intended to reduce noise impacts is in fact redirecting noise toward the most sensitive receivers. This concern has not been modelled or addressed in the EIS, and the Department should require this to be assessed before any determination.

The SLR report's treatment of cumulative operational noise (Section 6.2) states in a single short paragraph that the NPfl "accounts for potential cumulative impacts by lowering the criteria for each individual development" and therefore "do not require further consideration." This is not a cumulative assessment — it is a procedural assumption. There are now three hyperscale data centres either operational, approved, or proposed within 600 metres of the same residential boundary. No cumulative acoustic modelling of all three operating simultaneously has been conducted. The Department should require such modelling as a prerequisite to determination.

4. Air Quality — PM10 Exceedances Acknowledged, Cumulative Risk Rated 'Significant', No Monitoring Proposed

The Air Quality Impact Assessment (AQIA) prepared by SLR Consulting (Appendix T, December 2025) makes several significant concessions that the EIS summary underplays. Having reviewed the AQIA directly, I submit the following.

4.1 PM10 Exceedances ARE Predicted During Emergency Operations

The AQIA explicitly states (Section 7.3.1) that "the incremental increase in particulate matter predicted at the modelled receptors is expected to result in additional

exceedances of the PM10 criteria” during emergency generator operation. The AQIA attributes these exceedances to high background PM2.5 concentrations at the Macquarie Park Air Quality Monitoring Station, but PM10 exceedances are predicted regardless. The AQIA also predicts additional PM2.5 24-hour criterion exceedances if all generators operate for 24 hours continuously.

PM10 and PM2.5 particulates from diesel exhaust carry well-documented public health risks. The World Health Organization classifies diesel engine exhaust as a Group 1 carcinogen. The fact that PM10 exceedances are predicted at modelled receptors during the emergency scenario — which the proponent itself acknowledges could coincide with a simultaneous grid failure at AirTrunk — is a serious public health issue. The AQIA’s response is to note that exceedances “are attributed to high background concentrations” and to refrain from proposing any air quality monitoring. This is inadequate.

4.2 NO2 Exceedances Predicted at Four Receptors Under Emergency Scenario

The AQIA finds that a single exceedance of the 1-hour average NO2 criterion was predicted for four of the 57 receptors modelled under the conservative emergency scenario. The proponent dismisses this finding by calculating that, on a “more realistic” basis of one emergency event per year, the likelihood of an exceedance at the worst receptor is equivalent to “1 exceedance every 4,380 years.”

This dismissal is based on power interruption data from an entirely different facility in Eastern Creek, NSW, which experienced two interruptions in ten years — each lasting 13 to 21 minutes and involving only a partial loss of feeders. The site-specific grid reliability for the Lane Cove West area has not been assessed. I note that Lane Cove West and surrounding areas have experienced a higher-than-average frequency of power outages in recent years. The 4,380-year calculation also applies only to a single receptor at a single facility and does not account for the simultaneous operation of AirTrunk’s generators, which would occur in the same grid failure event. No combined modelling of all three data centres in emergency operation has been conducted.

4.3 Proponent’s Own Consultants Rate Cumulative Air Quality Risk as ‘Significant’ — And the Assessment is Already Out of Date

Table 41 of the AQIA (Section 7.3.2.1) presents the cumulative impact assessment. The proponent’s own consultants rate the potential cumulative air quality risk for AirTrunk SYD2 (500m) and Apollo Place Data Centre (400m) as “The project may result in significant cumulative air quality impacts under emergency conditions.” This rating appears twice — once for each facility. Yet the AQIA does not model the combined emissions of those two facilities with Project Mars in a simultaneous grid outage.

More critically, the AQIA is now materially out of date. At the time the AQIA was finalised (December 2025), it did not — and could not — account for a third new AirTrunk proposal at 87–91 Mars Road and 3–4 Apollo Place, which is reported to involve a 140MW facility with approximately 120 diesel backup generators. If this facility is approved and built, the combined generator fleet in the immediate vicinity of residential properties during a simultaneous grid outage would be: 49 (Project Mars)

+ approximately 120 (AirTrunk Mars Road) + the existing generators at SYD2 and additionally Apollo Place. The aggregate diesel particulate and nitrogen dioxide emissions from this combined worst-case scenario would be vastly greater than anything modelled in the AQIA, and the modelled PM10 and NO2 exceedances at residential receptors would be correspondingly far more severe.

The Department cannot properly assess Project Mars in isolation from this broader picture. The Department should require comprehensive combined air quality modelling of all five data centres in the Lane Cove West Business Park operating in emergency mode simultaneously, assessed at residential receptor locations including Cullen Street and at Lane Cove West Public School, before making any determination on this application.

4.4 No Air Quality Monitoring is Proposed During Operation

Despite the acknowledged PM10 and NO2 exceedances in the emergency scenario, and the “significant” cumulative rating, the AQIA concludes that “monitoring of air quality is not considered to be required during the operational phase.” The only proposed mitigation for operational air quality is that “neighbouring properties will be notified in the event that emergency operation of all of the generators is required.”

Notification after the fact does not protect residents from diesel particulate exposure during a grid outage. The Department must require ongoing ambient air quality monitoring at residential receptor locations, with automatic public disclosure of results, as a condition of any consent.

5. Built Form, Height Exceedance, and Visual Impact

5.1 Council Formally Opposes the Clause 4.6 Variation — All Four LEP Objectives Not Satisfied

Lane Cove Council’s formal submission dated 20 April 2026 explicitly states that the Clause 4.6 variation request “is not supported by Council” and that the proposed development “fails to satisfy the relevant tests required for assessing the proposed breach.” This is not a qualified or conditional objection — Council has analysed the variation against all four objectives of Clause 4.3 of the Lane Cove LEP 2009 and found it deficient on every one. I endorse Council’s analysis, and summarise the key findings below.

Objective (a) — to ensure reasonable solar access to existing buildings and public areas: Council finds that the non-compliant portions of the building generate additional overshadowing of retained trees, the adjoining C2 bushland, and the Blackman Park Skate Park. Critically, the Visual Impact Assessment and Clause 4.6 Request both extensively rely on existing vegetation as a screening buffer — yet that same vegetation will be adversely affected by the increased shadows generated by the very height exceedance they are being used to justify.

Objective (b) — to ensure privacy and visual impacts on neighbouring properties, particularly where zones meet, are reasonable: Council finds that the non-compliant portions are concentrated towards the zonal transition area — the east and south boundaries adjoining the C2 bushland and residential properties. These are the most sensitive receivers. The EIS itself states that the Mars Road frontage will “fully comply with the existing height control,” yet Council’s own mapping of the non-

compliant portions (Figures 2 and 3 of Council's submission) shows height exceedances along the frontage areas as well. This is a material inconsistency in the Clause 4.6 request.

Objective (c) — to seek alternative design solutions to maximise sunlight for the public domain: The Clause 4.6 request relies on articulation and upper level setbacks along the Mars Road frontage to justify the exceedance. But Council notes that no equivalent treatment has been provided along the eastern and southern facades — precisely the facades that face the most sensitive receivers and contain the most significant height breaches.

Objective (d) — to relate development to topography: The EIS argues the stepped massing responds to the site's sloping topography. Council rejects this, finding that the proposal "seeks consent to significantly alter the site's natural ground level" through up to 8 metres of excavation, which Council regards as "well beyond what is considered reasonable for the industrial zone," and then uses the excavated basement level to argue compliance with the height control from natural ground level. The effect is to inflate the building height while artificially depressing the base reference point.

I submit that the Department should give the greatest weight to Council's assessment on the Clause 4.6 variation, as the elected representative of the community that will be permanently affected by the height exceedance, and should refuse to accept the variation.

5.2 VIA Does Not Distinguish Retained from Removed Trees — Screening Relied Upon Does Not Exist After Development

Council's submission raises a methodological deficiency in the Visual Impact Assessment: the VIA "fails to differentiate between the existing canopy being retained and the trees proposed for removal." Council's submission states that this "significantly affects the extent of screening proposed which is extensively relied upon in the VIA and Clause 4.6 Variation Request," and that it "distorts the visual prominence of the proposed development and in particular the areas which breach the height development standard."

In plain terms: the VIA concludes the development will have "nil to low" visual impact largely because existing trees screen the building from view. But 90 trees are being removed. The photomontages were taken with those trees in place. The VIA does not model what the building will look like from residential properties and public spaces after those trees are gone. This is not a minor oversight — it is the central premise on which the entire VIA rests, and it is wrong.

5.3 VIA Omits Numerous Key Viewpoints — Confirmed by Council

Council has identified a further list of public recreation areas and residential properties for which no photomontage has been provided, including: Lane Cove West Tennis Club and courts (three vantage points), the Blackman Park Skate Park (two vantage points), the Council Community Nursery, the B1 and B2 synthetic sporting fields, 10 Banksia Close (front yard), 8 Banksia Close (rear yard), rear yards of 40, 44, 60, and 66 Wood Street, 71 Wood Street, Avalon Avenue, Lloyd Rees Drive (two vantage points), and 32, 41, and 64 Wood Street — a total of approximately 17 additional assessed locations required by Council.

Council notes that the proposed development is “up to 15m taller than the existing building which is already this height in some instances.” The VIA conclusion that visual impacts range from “nil to low” cannot stand in the face of these omissions.

5.4 Inadequate Tree Replacement Ratio

The EIS discloses that 90 trees on the site will be removed and only 104 replacement trees are proposed — a replacement ratio of 1.15:1. Council does not support the removal of several species that complement the ecological features of the surrounding bushland, including *Angophora costata*, *Eucalyptus pilularis*, and *Casuarina* species. Council’s submission confirms the BDAR identifies foraging habitat for the Large-eared Pied Bat will be destroyed. The replacement trees will take years to reach maturity and cannot replicate the existing screening function during the critical early operational years of the facility.

6. Water Consumption — Unjustifiable Demand on Public Resources

The EIS confirms (Section 3.8.2.2) that the estimated annual on-site water consumption for cooling is approximately 510,000 m³ of potable water. This represents an extraordinary demand on the municipal water supply for a private commercial development that creates only 26 permanent jobs. The EIS discloses that a centralised water-cooled chiller system combined with air-cooled chillers with adiabatic assist has been proposed to “balance footprint usage, water consumption, and PUE.” While the EIS notes that “conscious selection and operation of cooling towers will help to minimise the consumption of potable water,” it provides no binding commitment to alternative water sources, recycled water use, or enforceable consumption limits.

The Sydney Water/Interflow works that have disrupted Cullen Street and surrounding residential streets for the past year-plus were required to upgrade the water supply infrastructure serving the existing AirTrunk facility. During community consultation, Goodman stated that the Sydney Water/Interflow project “is not related in any way” to Project Mars. While technically true, this response misrepresents the situation: such infrastructure upgrades are the documented, predictable consequence of adding a data centre with enormous water demand to the local network. The Department should require Goodman to identify all utility infrastructure upgrades that will be necessitated by Project Mars’s 510,000 m³/year water demand, and to demonstrate that those upgrades will be funded and delivered by Goodman, not by Sydney Water ratepayers.

The Department should impose a legally enforceable annual potable water consumption limit as a condition of any consent, require a demonstrated commitment to maximising recycled water use, and insist on an annual water consumption reporting obligation with public disclosure.

7. Power Infrastructure and Risk of Grid Outages

The EIS discloses that the facility will use an estimated 81MW of power in its ultimate configuration. When added to the 110MW+ already consumed by AirTrunk SYD2 and the additional 45MW of the approved Apollo Place facility, the total power demand in the Lane Cove West Business Park will approach or exceed 236MW from

three facilities within 600 metres of each other. This is an extraordinary concentration of power load in a single local distribution network.

The Lane Cove West and Lane Cove North areas have already experienced above-average power outage frequency in recent years. The cumulative grid demand from three hyperscale data centres risks further degrading supply reliability for residential consumers. The EIS does not assess this cumulative grid impact at all. The Department should require a grid impact assessment from a qualified electrical engineer, covering the cumulative load of all three data centres and its implications for residential supply reliability, before determining this application.

8. Riparian Land — A Mandatory Pre-Condition to Consent Has Not Been Met

Section 6.3 of the Lane Cove LEP 2009 provides that “development consent must not be granted for development on land to which this clause applies unless the consent authority has considered the impact of the proposed development on the land and any opportunities for rehabilitation of aquatic and riparian vegetation and habitat on that land.” The site adjoins Riparian Land to the east and south as mapped in the NSW ePlanning Spatial Viewer.

The Ground and Water Conditions Assessment (Appendix V, PSM) has failed to satisfy this mandatory precondition. Council’s submission quotes the PSM report directly: PSM states that “details of the earthworks to be undertaken at the Site... are not known to PSM,” that it “assumes the excavation support for the basement will be designed to avoid impacts on neighbouring structures,” and that “impacts on surface water resource (quality and quantity), impacts on dependent ecosystems, drainage lines, downstream assets and watercourses are not addressed by PSM.” These are not findings based on analysis of the actual proposal — they are assumptions about a proposal whose detailed design was not provided to the assessor.

Most damagingly, Council notes that the adjoining Riparian Land is not even identified within Table 2.2 of the Remedial Action Plan (Appendix CC), which purports to assess the property environmental setting and surface water features within 1km of the site. The RAP therefore cannot have assessed the risk of contaminated soils entering the Riparian Land during the proposed remediation and 67,410m³ of excavation. Council states plainly: “the proposed development should not be supported as the consent authority cannot be satisfied that the impacts of the development on the Riparian land has been adequately considered.”

9. Construction Impacts — Documented Ecological Damage from AirTrunk Must Not Be Repeated

The proposed development involves demolition of four existing warehouse buildings, 67,410 m³ of bulk earthworks cut, and sustained rock excavation on a site that abuts residential land only 50 metres to the east. Before addressing the specific conditions required, I ask the Department to consider what construction and post-construction disruption has actually looked like for residents in this neighbourhood as a result of the existing AirTrunk SYD2 data centre.

9.1 The AirTrunk Apollo Place Sediment Overflow — Documented Ecological Damage, Not Just Amenity Disruption

I had previously noted the disruption caused by Interflow's Sydney Water upgrade works in residential streets as an analogy for what may occur with Project Mars. Council's formal submission adds a further and more serious documented precedent: during construction of the AirTrunk Apollo Place Data Centre at 1 Apollo Place, "inadequate sediment controls resulted in a major overflow of sediment into the adjacent endangered saltmarsh ecological community, causing significant ecological damage and necessitating an extensive, costly, and prolonged remediation effort."

This is not a hypothetical risk. It is a documented, severe environmental incident that occurred at the last data centre approved in this precinct. Lane Cove Council updated its DCP Erosion and Sediment Control requirements specifically in response to this event. The Project Mars site directly adjoins the same C2 Environmental Conservation zone — Coastal Enriched Sandstone Sheltered Forest and Riparian Land — on its eastern and southern boundaries. The site slopes naturally down toward these sensitive ecological areas. The 67,410m³ of bulk excavation proposed for Project Mars is a substantially larger earthworks program than the Apollo Place development. If sediment controls fail here, the consequences will be at least as serious.

Council also confirms that the fibre optic upgrade works required for the Apollo Place facility caused "devastating impacts to Council's bushland and public domain," including "widespread damage to verges, footpaths and private property which resulted in adverse environmental impacts and safety hazards for pedestrians" and "the failure of many significant trees located in the bushland." These consequences "could have been reasonably mitigated if presented at the assessment stage through the implementation of standard conditions." Council states that without equivalent conditions for Project Mars, "similar adverse impacts are likely." I request that infrastructure upgrade plans for all utilities — water, electricity, fibre optic, roads — be provided to Council before determination.

9.2 Construction Dust — Direct Threat to the Lane Cove Community Nursery

Council's submission describes in detail why construction dust from Project Mars poses a specific and serious threat to the Lane Cove Community Nursery, which is located on the eastern boundary of the site. The Nursery has been in operation since 2005, has produced 281,390 native plants, hosts 532 volunteers per year, and plays a critical role in the regeneration of Lane Cove's bushland reserves and wildlife corridors. Council explains that construction dust particles "prevent photosynthesis and clog stomata (the tiny pores on leaves) which limits carbon dioxide uptake and gas exchange." Over time this leads to "failed plants, slower growth, poorer plant health, and reduced yield, especially for young or sensitive nursery plants."

The EIS has not addressed the dust impact on the Nursery. Council states the development "should not be supported as the potential construction and heat impacts on Council's Nursery have not been adequately addressed." Council also notes that anthropogenic heat from the operating data centre and the substation positioned adjacent to the eastern boundary may affect the Nursery's microclimate in ways that have not been assessed. The Department must require a specific dust and heat impact assessment for the Nursery, with binding mitigation obligations, as a condition of any consent.

9.3 The Interflow / Sydney Water Works — A Case Study in Inadequate Protection

Sydney Water engaged Interflow as its contractor to install upgraded water supply infrastructure to service AirTrunk's SYD2 facility. These works have been ongoing for well over a year and have caused sustained and serious disruption to residential streets in and around Lane Cove West. The scale of the works — necessary to meet the enormous water demand of a single 110MW+ data centre — involved extensive trenching, pipe installation, and road and footpath reinstatement across multiple local streets.

The impact on residents has included prolonged loss of on-street parking; extended periods of road and lane closures disrupting local traffic circulation; noise from heavy machinery operating during and at the margins of permitted construction hours; damage to residential verges, landscaping, and kerbing that was not consistently or promptly made good; and the visual and practical blight of an active civil construction site in residential streets for a period far exceeding what residents were advised to expect.

These works are the direct and foreseeable consequence of the water consumption profile of a hyperscale data centre — and yet they were not adequately anticipated or disclosed to residents at the time AirTrunk SYD2 was assessed. The EIS for Project Mars confirms the facility will consume approximately 510,000 m³ of potable water per year. It is inconceivable that this demand will not similarly require substantial water supply infrastructure upgrades in the local network. The EIS does not identify or assess this downstream construction impact at all, and no conditions have been proposed to manage it.

Goodman must be required, as a condition of any consent, to identify all utility infrastructure upgrades necessitated by the development (water, power, communications, and stormwater), to carry out a full assessment of the construction impact of those works on residential streets and properties, and to lodge a bond or make provision for full reinstatement of any residential verges, footpaths, and landscaping disturbed in the course of any utility works associated with the development — whether those works are carried out by Goodman directly or by a utility provider on its behalf or on behalf of its customers.

9.4 Cabling Works by AirTrunk Customers — Another Unaddressed Precedent

A related and equally troubling precedent from the existing AirTrunk facility is the conduct of cabling contractors working on behalf of AirTrunk's customers — not AirTrunk itself — who have repeatedly excavated residential verges and footpaths across the Lane Cove Council area to lay fibre and data cabling connections to the SYD2 facility. These works proceeded with minimal notice to residents and with damage to public infrastructure that in some cases has still not been fully repaired. The EIS for Project Mars does not address this risk at all.

9.5 Specific Construction Conditions Required — Including Council's Saturday Respite and Parking Protections

In addition, the following must be required:

- High noise generating activities — including rock breaking, saw cutting, jack hammering, excavation, and haulage truck movement — must be restricted to 8am–5pm Monday to Friday with a midday respite period, and strictly limited to 8am–12noon on Saturdays with NO such activities permitted after noon on Saturdays, given the significant impact on Blackman Park sporting clubs whose peak times are Saturday mornings;
- No construction staff or trades vehicle parking is to occur on residential streets including Alder Avenue, Henley Street, Moore Street, Hallam Avenue, Yethonga Avenue, Currawong Avenue, Banksia Close, Avalon Avenue, Wood Street, Cullen Street, Penrose Street, and Myee Crescent;
- No construction staff or trades vehicle parking is to occur at Blackman Park at any time during the construction program;
- A Dust Monitoring Plan with devices on all boundaries recording at half-hour intervals must be provided before works commence, with results reported to Council;
- A Noise Monitoring Plan with devices on all boundaries recording at half-hour intervals must be provided before works commence, with results reported to Council;
- Specific water cannons along the southern and eastern boundaries for dust suppression to protect the Nursery.

10. Ongoing Impacts After Construction

The lived experience of this community with AirTrunk demonstrates that the impacts of a data centre do not end when construction is complete. Ongoing infrastructure works — including Sydney Water/Interflow pipe upgrades and cabling works by third-party contractors — have continued to disrupt Cullen Street and surrounding residential streets for years after AirTrunk commenced operation. Conditions of consent for Project Mars must impose obligations on the operator to make good any damage to public infrastructure caused by its customers or service providers, and must include a binding mechanism for residents to report and escalate damage that is not rectified.

11. Cumulative Impact — Five Data Centres, Minimum 395MW, an Unassessed Catastrophe for This Neighbourhood

As recently as 12 April 2026, it was reported that two further data centres are planned for the Lane Cove West Business Park in addition to Project Mars and the existing/approved AirTrunk facilities. The full picture, as it now stands, is five hyperscale data centres within a single suburban industrial precinct:

- AirTrunk SYD2 (1 Sirius Road) — 120MW — operational;
- AirTrunk Apollo Place (1 Apollo Place) — 45MW — approved;
- AirTrunk Mars Road (87–91 Mars Road / 3–4 Apollo Place) — 140MW, approximately 120 diesel generators, five storeys, significantly breaching height controls — at SEARs stage;
- Goodman Project Mars (12 Mars Road) — 90MW, 49 diesel generators — currently on exhibition; and

- DC Alliance (16–20 Mars Road) — MW unknown — progressing through the IDA.

The EIS's cumulative assessment is based on an incomplete picture of the future state of this precinct. No assessment has been conducted of what this neighbourhood will look, sound, smell, and feel like when all five data centres are built and operational. No assessment has been conducted of the combined grid load, the combined water demand, the combined backup generator fleet, or the combined diesel particulate emissions during a grid failure. These assessments are not optional extras — they are the minimum that residents are entitled to expect before the Department adds one more facility to a precinct that is already being developed beyond any reasonable community tolerance.

I submit that the Department should not determine Project Mars in isolation from the other four facilities. The Department should either: (a) defer determination of Project Mars until a comprehensive, independently prepared cumulative impact assessment of all five proposed facilities is complete and publicly exhibited; or (b) refuse consent on the basis that the EIS cannot properly satisfy the requirements of the Environmental Planning and Assessment Act 1979 in circumstances where the proponent's own assessment of cumulative impact is materially incomplete and out of date.

As a minimum, the following specific cumulative matters must be addressed before any determination:

- A full five-facility cumulative acoustic assessment, modelling all data centres operating simultaneously in both normal and emergency scenarios, with results verified at residential receptor locations on Cullen Street, Wood Street, and Banksia Close, and at Lane Cove West Public School;
- A full five-facility combined worst-case air quality assessment of simultaneous emergency generator operation across all facilities, with results verified at the same residential and school locations;
- A cumulative annual potable water demand assessment for all five facilities on the local distribution network, with a Sydney Water infrastructure capacity verification;
- A cumulative power grid load assessment for all five facilities and its implications for residential supply reliability and outage frequency in the local distribution network;
- A cumulative visual impact assessment showing what the precinct will look like from Cullen Street, Blackman Park, and Lloyd Rees Drive when all five facilities are built; and
- A cumulative traffic and heavy vehicle assessment for all five facilities' construction and operational phases.

12. Planning Process Concerns — Council's Opposition, SSD Classification, and the IDA Pathway

Lane Cove Council's formal submission of 20 April 2026 concludes that the proposed development "should not be supported" and that it is "not considered to be within the Public Interest." Council identifies 16 separate grounds of objection spanning infrastructure, height, views, excavation, the nursery, bushland,

environmental health, traffic, sustainability, employment land, and public interest. This is an unequivocal rejection of the development by the elected council representing the affected community. The Department should treat this as carrying the highest possible weight.

Council's submission also draws attention to a public petition against the development that had already attracted over 800 signatures at the time of Council's submission (20 April 2026), with submissions closing 28 April 2026. Council states that these submissions "should be considered by the Department and responded to by the Applicant." I endorse that request.

13. Conclusion and Requests

For all the reasons set out above, and in alignment with the formal position of Lane Cove Council which has stated that the development "should not be supported" on 16 separate grounds, I respectfully urge the Department to refuse development consent for SSD-82052708, Project Mars Data Centre.

The decision the Department makes on Project Mars will, as a practical matter, set the conditions under which the broader cluster of five data centres in this precinct is assessed. If Project Mars is approved without a proper five-facility cumulative assessment, each subsequent application will similarly be assessed in a vacuum. The residential community of Lane Cove West deserves to know — now, before any of the remaining approvals are granted — what the full cumulative impact of all five facilities will be. I therefore ask, in the alternative to outright refusal, that the Department defer determination of Project Mars until a comprehensive, independent, publicly exhibited cumulative impact assessment of all five Lane Cove West Business Park data centre proposals has been completed.

I thank the Department for considering this submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Rajiv Viswanathan', with a long horizontal flourish extending to the right.

Rajiv Viswanathan

Date: 19 April 2026

Address: 66 Cullen Street, Lane Cove West NSW 2066