Re: 12 Mars Rd, Lane Cove West Data Centre proposal (SSD-82052708)

I object to this proposal.

This proposal is completely inappropriate for its location. Built hard up against local residences (~16m boundary-to-boundary in one spot), located on a steep slope with its proposed height significantly exceeding local planning laws and overshadowing a number of important community facilities, this data centre should not be approved.

Additionally, the process with which this proposal has been undertaken is a disgrace. Right from the outset, the developer has attempted to push through this proposal without full and proper stakeholder engagement. Also, with two key NSW government-led initiatives (a Parliamentary Review of Data Centres, plus Data Centre Consultation Paper and its five proposed principles) being currently worked on, the local community is being treated with absolute contempt. The result of this rush is a hastily prepared Environmental Impact State (EIS) is error-riddled, full of half-truths, omissions and sleight of hands. The lack of transparency at every stage has angered our local community and now, finally, we have the opportunity to review all aspects of this project and have our voices heard. I trust that the NSW Dept of Planning, Housing and Infrastructure (DPHI) thoroughly reviews these submissions and ensures this proposal does not proceed.

To support my objection to this proposal, I note the following:

1) Engagement – I participated in a number of "community engagement" events, including the Urbis facilitated discussions at Lane Cove Library in August 2025. The information provided was scant and no meaningful discussion could be undertaken with the attendees. Given the impact on our local community is considered "high" in my view (rather than the documented "low to moderate" by the developer), and supported by the ongoing feedback through this exhibition timeframe, the engagement process should have been far more robust!
   Also, the timing of the release of the EIS and commencement of the Exhibition period, arriving in mailboxes (if you were "lucky" enough to receive them – with residents in key impact areas missing out) just before the Easter break, school holidays and a long weekend, again highlights the surreptitious approach.
2) EIS Errors and Omissions – across the various documents associated with this proposal, there are numerous errors and mistakes (misrepresentations – flow on impacts) that affects the ability for the community to have an informed view. It also contributes to a lack of faith in the ancillary documents that rely on the initial disclosure. Examples of which are:
   a. **Distance** – as noted above, the shortest distance, boundary line to boundary line is approximately 16m. However, it has been described across the documentation anywhere from 50m (from Goodman's original

request dated 18th March 2025) to 250m (a figure derived from Appendix SS - Geotechnical Assessment). When you have the Air Quality Assessment saying that the Lane Cove West Public School is 300m away, a critical error when you are talking about the impact on our young children, it is incumbent upon the DPHI to treat any information within the EIS with some scepticism.

b. **Height** has been described as anywhere from initially "15m – 25m" from the application dated 18th March 2025 to 28.3m in the EIS, as well as 33m in Appendix H (Architectural Design Report, dated 17th Feb 2026) and Appendix T (Air Quality Impact Assessment). Critical to this proposal is Appendix JJ (Social Impact Assessment) saying the height is 18 metres, the ceiling imposed by Lane Cove Council (LCC). How can the SIA have any credibility if that is what they base the height off. Further, in the same document it says the data centre would operate 25 hours a day, 7 days a week (page 53 – unbelievable error… and when you thoroughly read through the SIA, the more it becomes apparent they are not experts in this field. Does the DPHI question the veracity of all such "experts" or take the word of the developer?).

   More importantly, these height discrepancies sap any confidence the community has in this 3000+ page document. Can we be assured that the Appendices that rely on accurate height measurements be correct? For example, does the Visual Impact Assessment base its photomontages off 18m (LCC LEP requirements), 25m, 28.3m or 33m? The lack of clarity only adds to our concerns about the scale and impact of this oversized project. Lastly, what is the intention of the developer with regard to height? Could they increase the development to 33m as it was flagged in the Architectural Design Report (Appendix H)? Or is it permissible, under certain circumstances, for a further increase beyond 33m during development? This variability needs to be narrowed to a specific height level and confirmation that all associated material is based on the correct numbers.

c. **Power** has been noted as anywhere from 60 MW (Appendix T, Air Quality Impact Assessment) to 81MW (EIS) and 90MW (the latter from the application lodged with DPHI on 19th Feb 2026). Elsewhere the transformer has been described as 90MVA which, depending on the engineer you talk to, equates to 90MW. Clarity of terms and consistency of power usage should be mandatory (I note that the DPHI requested such clarity from the Marsden Park project where the regularly touted 504MW eventually became 720MW). Further, my understanding is that the proposed transformer should run at 80% capacity and therefore lower MW output. Can the developer please give more details on this issue and

its ability to increase this capacity (could, for instance, it be lifted to 100MW or 110MW post approval and prior to construction)? Knowledge of the true capacity of power output and requisite cooling requirements is important in understanding potential increases in utilities usage, air quality and noise impact.

In terms of Appendix T (Air Quality Impact Assessment) which states "Power Consumption = 60 MVA" and elsewhere "60MW", you would have to believe that all its assumptions and calculations have subsequently been based on this number? With that in mind, how can anyone give credence to this Air Quality Impact Assessment based on such an error? Given the immediacy of residents, child care facilities, sporting fields and the LCW Public School, these are critical oversights!

d. **Development costs** – approx. $403mil (from application submitted on 19th Feb 2026) to $1.2bil (pre-development application), a vast discrepancy. In the EIS it varies from approx. $798mil (main body, page 27) to approx. $485mil (Appendix D, EDC Report). These are important differences as the developer attempts to justify the positive economic impact of this project. The EIS states that 26 full-time employees (FTE) will be employed (a downgrade from the Engagement Report that flagged 45 FTE once operational), the employment element will be a negative impact on the local business community as over 200 people are currently employed on this site. Another error to point out – full time construction jobs is noted as 200 in the EIS, vs the originally envisaged 350 FTE over 34 months in Appendix E. With the economic benefits shrinking in terms of employment and development spend, what is the potential for even weaker economic outcomes than proposed?

3) Risks – given the aforementioned proximity to residents, playing fields, child care and schools, this project has additional, inherent risks built into it. Risks that are significantly higher than other data centre operations, which are located well away from local communities and sited in "fit for purpose" industrial areas. Highlighting a few risks that cannot be mitigated (despite attempts in the EIS) and should result in this proposal being rejected:

   a. **Diesel** – Over one million litres of fuel stored next to residential housing is an unacceptable risk. No matter how the developer dresses up its ability to mitigate this risk, it will always be present! Further, across the globe we have recently seen many instances of unexplained fires and incidences that affected critical infrastructure. Whilst, from my research, these are more focussed on energy and chemical manufacturing facilities, the world has changed in recent years and all critical infrastructure, such as data centres, have become targets. Although we wish otherwise, Australia is unlikely to be immune from these events.

b. **Lithium-Ion batteries (LIBs)** – these are almost impossible to extinguish once alight. As per my comment above on flammable fuel being located so near residential housing and a school, having 194,000kg of such batteries in close proximity is highly dangerous (note that the Appendix NN, Fire Safety Concept Strategy has yet another error saying that it is 170,000kg of LIBs). Further, in Appendix JJ (Social Impact Assessment) It notes that management of such a hazard is complex and social impact negligible, yet Appendix FF (Dangerous Goods Report) highlights that thermal runaway may occur even with required sprinkler systems in place. It does not encourage me when this document states that these "events have been shown to self-extinguish…". Was that in a laboratory environment? Real world experience?
   Furthermore, at no point the *cumulative effects* of both a. and b. are assessed, nor combined mitigation in such unforeseen circumstances. Apart from sprinklers, we seem to be reliant on staff education and hoping they get it right thing in a worst-case scenario.
   By the way, residents of Avalon Ave are trapped in such a disaster – especially if an event occurred at night or on a weekend (locked school gates does not allow an escape path).
c. **Substation** – closest on-site hazard to residential housing (less than 40m building to building) and has to be within 10m of an external fire hydrant. I cannot determine from any plans whether that is the case. Assuming it will be provided, will it be adequate in the event of an emergency.
d. **Blackouts** – these have been known to occur in the area. With increased electricity usage in the LCW Industrial Area (and substantially more once approved data centres come on line) and the threat of heatwaves requiring greater aircon use, I would suggest the frequency of local blackouts can only increase. In that event, the throwaway comment describing power interruptions as occurring "very infrequently and for a limited period" (page 20 of Appendix T), will be redundant. Of course, this will lead to a combination of a greater use of diesel generators and containment of electricity use by local residents and businesses. These scenarios are already occurring overseas with some communities facing blackouts to ensure data centres remain operational.
e. **Excavation issues** – as approximately 67,410m^3 of soil / rock will be excavated to a depth of 8m into bedrock (from Appendix SS - Geotechnical Assessment, where they highlight the difficulty in drilling boreholes in five of ten instances). The repercussions of having to excavate such hard rock will be upside variations of noise and vibration to stipulated limits and, in my view, will require a longer timeframe to complete this task. Increased vibration is certainly a risk to the structural

integrity of nearby housing, as well as other buildings in the industrial area.

Additional sections that I am basing my objective on:

1) **Urban Heat Island (UHI) effects** – I am concerned about the impact this development will have on our environment driven from the additional heat it generates into the local area. Global studies have shown that data centres can increase nearby ambient temperatures by as much as 9 degrees. As we live in a warm and humid climate, particularly through the summer months, and that this project is so close to housing and sensitive bush areas, a hyperscale data centre is completely inappropriate for this location.
   Furthermore, I trust the irony hasn't been lost when in Appendix TT (Urban Heat Island Advice), the developer states that the local council (Lane Cove) has adopted urban cooling strategies… the key one being the Lane Cove Community nursery. The exact same nursery, staffed by council workers and volunteers, that has provided 250,000 trees into the local community in recent years, is going to be overshadowed by these buildings, impacted by ongoing noise and be inundated by diesel fumes (when in use) and, through the three-year construction phase, cop significant dust and vibration.
   As the data centre will be driver of this micro-climate change, I would question how the developer can negate the overall impact of the project on localised temperatures. This is relevant to the building size, scale and materials, as well as the heat derived from its operational activities (i.e. cooling its microchips).
   A further question I have is what is proposed long-term plan of maintaining these various surfaces to meet UHI requirements? How will that be audited over time? Will there be an ongoing audit of the vegetation on site and remedial work undertaken if problems arise?
   Lastly, it is interesting that the developer refers to Lane Cove Council guidelines for Environmental Sustainability, yet completely overrides its rules on height restrictions, as well as tree canopy requirements of new developments (should be 35% vs 24.7% in the EIS and, in yet another discrepancy, 29.6% in Appendix TT, UHI Advice). Also, in the same document, LCC suggests businesses need to "improve amenity and liveability of residents and reduce reliance on cooling and associated operation costs" and also, "limit the retention of heat within the urban environment".
   It is suggested that because it's an elevated site, UHI is minimised. Given the closest housing is level with the lower part of the project (and 16m away on a boundary-to-boundary basis), plus the higher humidity driven by the release of heat, I would question the veracity of this report and the "expert" that signed it off. Furthermore, in determining the outcome of this proposal, will there be

consultation of global best practice studies? Will there be an attempt to align this project to the overarching mission of achieving Net Zero?

2) **Noise** – we are moving from an industrial area that operates business hours, 5 days/week to a 24/7 operation. This will completely change the acoustic environment and force local residents to live with an incessant hum for the rest of their days. With so many unknowns around this development, from having no firm specification of plant and equipment to the unique topography of the site, there is no way of calculating actual operational noise levels and whether they will meet limits. Recent readings from AirTrunk at 1 Apollo Place, Lane Cove West, showed noise limits were exceeded by 11dB(A). With residential housing so much closer to the 12 Mars Rd proposal, such outcomes would be a disaster for local residents. Additionally, that is on the basis that these acoustic limits are set correctly. With much discussion coming out of the US about limits being too high and local residents pushing back against such developments, we should be extra cautious here for a project that is so close to existing dwellings. Retrofitting noise abatement equipment (again, as being mooted in some US states) will be expensive. Lastly, the cumulative effects of noise, particularly nighttime output from the various proposed data centres (particularly 16-20 Mars Rd), must also be considered in totality rather that in isolation for this proposal.
3) **Visual impact** – as previously noted, I have questions around the veracity of Appendix N (Visual Impact Assessment) particularly around the heights it was using to calculate photomontages. Nowhere in the document it clearly states the figure being used. It also contains a number of viewpoints that you can only describe as a sleight of hand. View 07 (17 Wood St) is completely disingenuous – move the photo about 20m to 30m further north of that point and you have a clear view across the valley to the industrial area. It would have given an excellent idea of what the scale of the proposed building. Blackman Park is another – with no view taken from the synthetic turf (top ground). It appears that Urbis is trying to avoid how large the proposal will visually look from those playing fields. As for viewpoint 03 (Lane Cove West Public School), it does not point directly at the highest point of the proposed structure. Rather, it aims at the substation – a much lower building, with the taller towers around to the right of that photomontage. I trust DPHI can examine each further.
4) **Physical location** – I am troubled by this proposal's intention to build a data centre on such a steep slope. In my research of global data centres, I have not found an instance of such a development. Invariably they are located on flat ground and well away from housing. There are large swathes of level areas in Western Sydney (e.g. around Eastern Creek) where data centres are already located with many more under development or in the planning pipeline (and well away from residential housing). Furthermore, these developments dwarf what is

being proposed at 12 Mars Rd – with Goodman Group itself proposing a 500MVA facility at 10 Roberts Rd, Eastern Creek (i.e. approx. six times in scale).

5) **Waste** – the previous point also throws up the question of waste and the project's carbon footprint. The comparative cost of developing 12 Mars Rd, with its unique nature of slope, substantial rock (requiring excavation) and existing infrastructure built on top (cement / buildings / etc), to that in Eastern Creek, means greater use of precious resources as well as the massive effort in disposing of soil and redundant infrastructure (and the environmental flow on impact that has). Why approve such an environmentally damaging project, as well as subject the local community to three years of construction misery, when other more environmentally sympathetic Sydney-based options remain available.
6) **Water** – as clarity around water infrastructure, consumption and disposal via stormwater / sewerage piping is decidedly lacking, it's not possible for the community to understand the true demand this facility will incur. There are additional implications for upgrades to water pipelines that run the length of Lane Cove West (from the industrial area through to Epping Rd, via Hallam Ave). We have already seen 18 months of disruption for a single 110MW facility (AirTrunk) with its many issues causing rework after rework. The contractor, Interflow, has refused to acknowledge who the work was for and the length of time it will take – nor have the adequately resurfaced these roads… and remains a danger to cyclists using this path! As it stands, the EIS is relying on future discussions with Sydney Water to draw up appropriate plans for implementing this aspect of the project. Given what we have seen over the last 18 months, the local community does not hold much faith in what will transpire
   I would also add that cooling systems are remain open to change according to the EIS, however, they are clear in not wanting to use dry systems due to energy efficiencies. Though that does mean this proposed design requires massive volumes of potable water in a dry climate!
7) **Cumulative impacts** – whilst each development is initially assessed in isolation, I don't believe such an approach adequately captures the impact of aggregating a number of hyperscale data centres within a limited geographic area. Whether it is in the construction phase (no guarantee these projects will be sequential or concurrent – either way, it will be terrible for both residents and the industrial area) or operationally. The compounding effects of noise and heat generation; water and energy demand; and environmental damage need to be taken into consideration when addressing this project.

In conclusion, I believe there are far more appropriate sites in Sydney for data centres. This proposal, with its substantial risks and exceedingly close proximity to residential housing, playing fields, child care facilities and a public school, should be rejected.