Submission to: NSW Department of Planning, Housing and Infrastructure Application: SSD-82052708 — Proposed Data Centre, 12 Mars Road, Lane Cove West

Relationship to site: Owner of property on Banksia Close within 30m of proposed site

Date: May 2026

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

own a residential property on Banksia Close, Lane Cove West, within 30 metres of the proposed facility. We are one of the most immediately affected private landowners in this application. I have reviewed the Environmental Impact Statement in full, including appendices and the NSW Data Centre Consultation Paper released by Infrastructure NSW on 27 March 2026.

I am not opposed to digital infrastructure or data centres in principle. My objection is to this development, at this scale, in this location, on this evidence base.

This submission advances the following grounds for refusal:

- The document suite is so internally inconsistent that it cannot provide a reliable basis for consent
- The Clause 4.6 Variation Request is defective
- The directly affected residential property on Banksia Close has not been assessed with the specificity its proximity demands
- Operational noise and low-frequency hum remain unresolved
- Diesel storage arrangements are contradictory across documents, and fire safety and emergency response have not been adequately assessed
- Air quality impacts during generator testing and emergency operation have not been adequately addressed
- Construction impacts on the immediately adjoining residential street have not been adequately assessed
- The compliance framework proposed has demonstrably failed at the adjacent facility
- Cumulative impacts have not been properly assessed
- Mitigation is too heavily deferred to future decisions to support a consent now
- The proposal fails all five of the NSW Government's own principles for sustainable data centre investment

The questions in this submission are about the justification, reliability and accountability of this application as lodged. Goodman must answer each in its Response to Submissions with specificity. Statements of future compliance, references to forthcoming management plans, or promises of post-approval verification are not adequate answers to questions about the impact of a 24/7 industrial facility on a residential property within 30 metres of the site.

A single question addressing all identified cross-document discrepancies is posed at the end of this submission.

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1. The Document Suite Cannot Support a Consent

This application contains at minimum 24 confirmed internal inconsistencies across its 46 documents, detailed in full in Appendix 1 to this submission. The most significant are set out below — not as a list of errors to be corrected, but as evidence that this application does not present a coherent, internally consistent account of what is actually being proposed.

1.1 Building Height — Three Incompatible Figures

Document	Maximum Height
Main EIS (Table 9, Section 3.4.1)	**28.3 metres**
Appendix OO — Clause 4.6 Variation Request	**28.3 metres**
Appendix T — Air Quality Impact Assessment (Table 2)	**33 metres**
Appendix H — Architectural Design Report (per Lane Cove Council submission, 20 April 2026)	**33 metres**

The Clause 4.6 Variation Request — the legal instrument on which any consent to exceed the height standard entirely depends — seeks approval for a height that the applicant's own Air Quality Impact Assessment states the building already exceeds by 4.7 metres. Every shadow diagram, visual impact assessment, and planning ground in Appendix OO has been prepared on a height figure that at least two of the applicant's own consultants do not accept.

Question 1: On what basis does Goodman ask the Department to determine an application where the Clause 4.6 Variation Request seeks approval for a height that its own Air Quality Impact Assessment states the building already exceeds? What confidence should decision-makers and affected residents have in the planning grounds advanced for a variation instrument that appears to justify a building shorter than the one being proposed?

1.2 Power Capacity — Four Incompatible Figures

Document	Power Figure
NSW Planning Portal / SEARs application	**90 MW**
Sydney Water Feasibility Letter (Appendix KK, Appendix B)	**90 MVA**
Main EIS (Section 1.2)	**81 MW**
Appendix OO — Clause 4.6 Variation Request	**81 MW**
Appendix T — Air Quality Impact Assessment (Table 2)	**60 MVA / 60 MW**

The Air Quality Impact Assessment — which determines the number of generators modelled, emissions produced, health impacts predicted, and whether NO_2 criteria are met — was prepared on the basis of a **60 MW** facility. The facility is being presented to the public and to Sydney Water as **90 MW**. The EIS seeks consent for **81 MW**. The NO_2 exceedances already admitted in the emergency scenario (Appendix T, Table 14) were modelled on a facility operating at two-thirds of its consented capacity.

Question 2: If the Air Quality Impact Assessment modelled a 60 MW facility while consent is sought for 81 MW and the facility is marketed as 90 MW, on what basis does Goodman assert that the predicted NO_2 exceedances in emergency scenarios represent a ceiling rather than an underestimate? What mechanism prevents the facility from operating at a power level not captured by any compliance condition attached to this consent?

1.3 Construction Duration — 24 Months (Main EIS) vs 34 Months (Appendix KK)

Main EIS Section 3.9 states construction will take **24 months**, commencing **Q1 2026** — a date already past at lodgement. Appendix KK (Infrastructure Report, HDR, Section 2.7) states construction will take **34 months**, commencing **Q1 2027**. The noise assessment, traffic management plan, and social impact assessment were each prepared on one or the other of these figures — meaning at least some of them have underestimated the duration of impacts on residents of Banksia Close and Wood Street by more than 40%.

Question 3: What does Goodman say to residents of Banksia Close whose understanding of the construction impact on their lives — derived from the main EIS — is based on a program that is either 10 months shorter or starts a year later than the program used to plan the facility's own infrastructure? How were the noise, traffic and social impact assessments prepared consistently if the construction program itself is described differently in different documents?

1.4 Distance to Nearest Residential Receivers — Four Different Figures

Document	Distance to Nearest Residential
Main EIS (Tables 5 and 9)	**50 metres east**
Appendix T — Air Quality (Section 2.2)	**50 metres east** (Wood St) and **50 metres north** (Banksia Close — wrong direction)
Appendix O — Traffic Assessment (Section 3.1)	**200 metres east**
Appendix DD — Waste Management (Section 2.0)	**200 metres east**, **250 metres north**
Appendix KK — Infrastructure Report (Section 1.0)	**200 metres east**, **250 metres north**
Appendix U — Noise Assessment (Table 2, NCA02)	**25 metres east**

The operational management framework for a facility housing 49 diesel generators was prepared by the traffic, waste and infrastructure consultants on the assumption that the nearest home is 200 metres away. The acoustic data confirms it is 25 metres. Appendix T also describes Banksia Close as being to the **north** of the site when it is to the **east** — an error that affects the direction in which generator emission plumes are modelled to travel.

Question 4: The Waste Management Plan, Operational Management Plan, and Construction Traffic Management Plan were each prepared on the assumption that the nearest residential receiver is 200 metres from the site. The acoustic data confirms it is 25 metres. What specific operational controls — governing truck movements, delivery hours, site access, noise and emissions management — does Goodman propose that would be materially different if these documents had been prepared on the correct receiver distance, and why should the Department accept plans calibrated to the wrong figure?

1.5 Generator Testing Hours — 122.5 Hours (Main EIS) vs 155.2 Hours (Used in Modelling)

Document	Annual Testing Hours
Main EIS (Table 11)	**122.5 hours**
Appendix T — AQIA	**155.2 hours**

Document	Annual Testing Hours
Appendix KK — Infrastructure Report (Table 3)	155.2 hours
Appendix JJ — Social Impact Assessment	155.2 hours

The compliance conclusions in the Air Quality Impact Assessment are based on 155.2 hours of annual diesel generator testing. The main EIS presents 122.5 hours to decision-makers and the community. The 32.7-hour gap is not inconsequential: it represents additional diesel combustion, additional NO_2 and PM2.5 emissions, and additional noise affecting residential receivers, during hours that no consent condition based on the main EIS figure would capture.

Question 5: If the Department attaches a consent condition limiting generator testing to 122.5 hours per year — the figure in the main EIS — what prevents the facility from testing for the full 155.2 hours used in the AQIA modelling? Would operation at 155.2 testing hours per year exceed any predicted air quality or noise compliance threshold modelled in this EIS, and on what basis has this not been assessed?

1.6 Trees — Three Incompatible Figures, One Admitted DCP Non-Compliance

Document	Trees Removed
Main EIS (Table 9 and throughout)	90 trees
Arborist Report / Landscape Report (per SIA Section 6.2.2.1)	82 trees
Social Impact Assessment (Section 6.3)	121 trees including 7 Category A high-retention-value trees

The Social Impact Assessment — prepared by the same firm as the main EIS — records 31 more trees being removed than the main EIS states. More significantly, the SIA (Section 6.3) expressly acknowledges that the proposed canopy cover of 24.7% does not meet the Lane Cove DCP's 35% requirement for industrial developments. This admitted DCP non-compliance appears in an appendix and is absent from the main EIS.

Question 6: On what basis has a confirmed DCP non-compliance on canopy coverage — acknowledged by Goodman's own consultant in the Social Impact Assessment — been omitted from the main EIS, and what weight does Goodman say the Department should give to a DCP compliance claim in the main EIS that the applicant's own SIA explicitly contradicts?

The six discrepancies above are not peripheral. They concern the height of the building, the power at which it will operate, the duration of construction, the distance to the nearest home, the hours of diesel engine operation, and the number of trees removed. These are the parameters on which every technical assessment depends. Where consultants have used different figures, the assessments built on those figures cannot all be correct — and the Department and the community have no way of knowing which conclusions to rely upon. A consent granted on this basis would be built on an unresolvable ambiguity about what, precisely, has been approved.

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2. The Clause 4.6 Variation Request Is Legally Defective

The Clause 4.6 Variation Request (Appendix OO) seeks a variation to the **height** standard under Clause 4.3 of the Lane Cove LEP 2009. The document's operative justification section (Section 11) opens:

*"As set out below, the extent of the **FSR variation** is supportable on the following environmental planning grounds..."*

No FSR variation is sought. The FSR of 0.65:1 complies with the 1:1 maximum under Clause 4.4. Section 11 purports to justify a height variation by advancing grounds for an FSR variation. Under the NSW Land and Environment Court's judgment in *Initial Action Pty Ltd v Woollahra Council* [2018] NSWLEC 118 — which Appendix OO itself cites — Preston J held that the grounds in a Clause 4.6 request "must justify contravening the development standard." A request that identifies the wrong standard in its operative section has not met this requirement.

The primary substantive ground advanced in Section 11(c) is commercial: *"A 81MW building targets hyperscale operators."* The objectives of Clause 4.3 are solar access to existing buildings and public areas; privacy and visual impacts on neighbouring properties; alternative design solutions to maximise sunlight for the public domain; and relationship to topography. None of these objectives is engaged by the commercial requirements of hyperscale operators.

The document also characterises the height variation near the eastern boundary as "only a very small variation." My property is 6.3 metres from that boundary. The building reaches between 28.3 and 33 metres at this interface — an exceedance of between 57.2% and 83.3% of the 18-metre standard. Lane Cove Council's submission states the Clause 4.6 variation is not supported, that the greatest height breaches are located toward the most sensitive interfaces, and that no treatment has been provided along the eastern and southern facades facing homes, the Community Nursery and bushland.

Question 7: The Clause 4.6 Variation Request is the legal instrument on which any consent to exceed the height standard entirely depends. If that instrument justifies the wrong development standard in its operative section, and advances commercial rather than planning grounds in its substantive justification, on what legal authority does Goodman assert that the Department can validly grant consent to exceed Clause 4.3?

Question 8: What compliant 18-metre scheme was tested, what lower-impact alternative was modelled at the eastern and southern residential and parkland interfaces, and what specific impacts — on the residents of Banksia Close, on the Community Nursery, and on Blackman Park — would be avoided if the building complied with the height control at those interfaces?

Question 9: The Visual Impact Assessment does not include photomontages from Banksia Close, the corner of Avalon Avenue and Banksia Close, or any residential property on Wood Street, and its visual screening conclusions rely on vegetation that includes trees proposed for removal. What does the development look like from these locations after tree removal and before replacement planting matures — and how has Goodman assessed that impact on the people who will live next to it?

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3. The Most Directly Affected Properties Have Not Been Individually Assessed

My property is, by the applicant's own acoustic consultant, one of the nearest private residential property to the proposed facility, within NCA02 at 25 metres from the site boundary. The people living here and in neighbouring properties will sleep, work and spend time in the noise catchment of 49 diesel generators, 24/7 cooling systems, construction works and substation infrastructure at this proximity for the life of the consent.

No document in this EIS provides a property-specific assessment of individual properties on Banksia Cl, Avalon Ave and Wood St. No predicted noise level is given for the bedrooms of these properties. No predicted air

quality impact is given for its outdoor areas during generator testing. No predicted visual impact is provided from these individual properties vantage points. No construction impact is assessed at these specific addresses.

Question 10: What is Goodman's explanation for why these individual properties received no individual assessment in any of the 46 documents comprising this EIS? How does Goodman characterise the risk of proposing a 24/7 industrial facility at this proximity without knowing its specific impact on the immediately adjoining residential properties?

Question 11: What are the predicted operational noise levels — including A-weighted, C-weighted and octave band results — at the dwelling, bedrooms and outdoor areas of these properties under worst-case night-time operating conditions? What are the predicted air quality impacts at these addresses during routine generator testing and during emergency concurrent generator operation?

Question 12: What are the predicted construction noise and vibration levels at these properties during demolition, bulk excavation and hard-rock excavation — specifically the stages the NVIA identifies as causing moderate to high exceedances of Noise Management Levels at the nearest receivers — and what binding remedy is available to the residents of these properties if those exceedances materially affect their quiet enjoyment?

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4. Operational Noise and Low-Frequency Hum Remain Unresolved

The NVIA (Appendix U) assesses external boundary noise using A-weighted (dB(A)) measurements only. This methodology does not adequately characterise the noise that a 24/7 data centre primarily generates: continuous low-frequency tonal noise from large-scale cooling fans. As sound from data centre cooling systems passes through windows and walls, higher frequencies attenuate progressively, leaving the low-frequency hum more dominant inside a property than outside. The A-weighting scale attenuates low-frequency components by design — by as much as 25 dB at the frequencies data centres typically produce — meaning a facility can comply with its external dB(A) limit while producing a clearly audible, persistent hum inside adjacent bedrooms that is captured by no consent condition currently proposed.

The NVIA further relies entirely on indicative plant with no committed tenant and no finalised mechanical design. This is the methodology that, at the adjacent facility in this precinct, produced predictions that were 5 dB(A) lower than Phase 1 alone — resulting in a facility now operating 11 dB(A) above its night-time limit at receivers more than 150 metres away. My property is 25 metres from this proposed facility.

Question 13: If this facility operates within its external dB(A) consent limit but generates an audible low-frequency tonal hum inside the bedrooms of our local area — which no consent condition currently proposed would prevent — what remedy does Goodman say would be available to the residents of that property, and within what timeframe would that remedy operate?

Question 14: The NVIA assesses compliance on the basis of indicative plant with no committed tenant. At the adjacent facility in this precinct, the same approach produced noise predictions that were materially wrong before the facility was even half operational. Why should the residents of Banksia Close accept the risk that the same methodology produces the same outcome at 25 metres — and what specific, pre-operational independent verification mechanism does Goodman propose to confirm compliance before 24/7 operation commences?

Question 15: Generator testing of 155.2 hours per year is proposed Monday to Friday between 7am and 5pm, during school hours at Lane Cove West Public School and during working hours for residents of NCA02. What is Goodman's assessment of the cumulative noise, amenity and air quality impact on the residents of Banksia Close and on school children of 155.2 hours per year of diesel generator operation at full load, 25 metres from

their homes and 160 metres from their school — and on what basis is this characterised as an acceptable impact?

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5. Diesel Storage Is Contradictory and Fire Safety Has Not Been Adequately Assessed

This application contains three materially different descriptions of how diesel will be stored on this site. The Infrastructure Report (Appendix KK) states the final backup power system will be supplied by approximately **8 in-ground bulk fuel storage tanks**. Appendix H (Architectural Design Report) describes **above-ground diesel storage tanks**. The Engagement Report records Goodman responding to a community question about diesel leakage by stating that diesel would be stored in **steel tanks in a 4-hour fire-rated, bunded room with alarmed leak detection**. In-ground tanks, above-ground tanks, and a fire-rated bunded room are three different configurations with different fire risk profiles, different spill containment mechanisms, and different emergency response requirements.

This matters directly to the residents living 25 metres from this site. The Emergency Response Plan has not been exhibited. Final fire engineering documentation has not been exhibited. The total quantity of diesel stored on site — across bulk tanks, day tanks and generator systems — and its precise location relative to residential properties, the Community Nursery and Blackman Park have not been clearly stated in any document.

Question 16: Three documents in this application — Appendix KK, Appendix H and the Engagement Report — describe three materially different diesel storage configurations. On what basis does Goodman ask the Department and the residents living 25 metres from this site to accept a fire safety, spill risk and emergency planning framework built on an undefined and internally contradictory infrastructure description?

Question 17: In the event of a diesel spill, generator fire, lithium-ion battery thermal event, transformer fire, or extended emergency generator operation at this facility, what specific action would the residents of of Banksia Close generally be advised to take — who would advise them, within what timeframe, and on what authority?

Question 18: Why has neither the final Emergency Response Plan nor the final fire engineering documentation been exhibited for public review prior to determination — and why should the residents of Banksia Close be required to accept the risk of living 25 metres from a facility storing over 1,049,000 litres of diesel and 194,000 kg of lithium-ion batteries without knowing what the emergency plan for that facility actually requires of them?

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6. Air Quality During Generator Testing and Emergency Operation Has Not Been Adequately Assessed

The AQIA (Appendix T) was prepared on the basis of a **60 MW** facility. As shown in Section 1 of this submission, the facility may operate at 81 MW or 90 MW — proportionally increasing emissions above the modelled figures. The AQIA admits NO_2 1-hour criteria exceedances at multiple receptors in the emergency generator scenario. Lane Cove already ranks third worst in NSW for blackout frequency on a per-outage basis (PSS Distributors analysis of Ausgrid customer data, December 2024). The Consultation Paper notes that "diesel engine exhaust contains high levels of pollutants, including fine particulate matter (PM2.5) and nitrogen oxides (NOx), which are linked to adverse health outcomes." The proposed mitigation for an admitted air quality exceedance affecting residential properties, a primary school and a childcare centre is notification to neighbours.

Question 19: The AQIA admits NO_2 1-hour criteria exceedances at multiple receptors during emergency generator operation, in a precinct that already ranks among NSW's worst for blackout frequency. The proposed mitigation is a notification to neighbours. How does Goodman characterise the public health risk to children at Lane Cove West Public School (160 metres from the site) during an extended emergency generator event coinciding with school hours, high Blackman Park use, and an atmospheric temperature inversion — and on

what basis is issuing a notification an adequate mitigation for an admitted air quality exceedance at a sensitive receiver?

Question 20: What lower-emission backup power alternatives — including diesel particulate filters, selective catalytic reduction, hydrotreated vegetable oil (HVO), hydrogen fuel cells or grid-scale battery storage — were specifically costed and modelled for this site? For each alternative rejected, what was the basis for rejection, and what binding condition will require transition to a lower-emission fuel or technology when commercially available?

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7. Construction Impacts on the Immediately Adjoining Residential Street Have Not Been Adequately Assessed

The NVIA predicts moderate to high construction noise exceedances at the nearest residential receivers during several construction stages, including hard-rock excavation. The construction program — whether 24 or 34 months, on which documents disagree — will be conducted at a 6.3-metre setback from a residential property. Key construction details, including worker parking arrangements, truck routes, off-site utility works and real-time monitoring protocols, are deferred to future management plans.

Lane Cove Council's submission notes that previous data-centre-related infrastructure works in this area caused widespread damage to bushland, verges, footpaths and private property, and states that infrastructure surveys and upgrade plans should be provided before determination. The residents of Banksia Close have direct experience of what deferred construction planning means in practice — 15 months of water main roadworks not disclosed at the time of the preceding development's approval.

Question 21: Construction workers accessing the site from the eastern boundary will traverse or park near Banksia Close, Wood Street and Avalon Avenue — quiet residential streets that are the primary approach to the site for workers coming from the eastern access. What prevents construction workers from parking on these residential streets during the full construction period, and what binding parking management mechanism specifically protects Banksia Close, Wood Street, Avalon Avenue, Cullen Street and Penrose Street?

Question 22: What off-site works are required for power, water, sewer, stormwater, fibre and roads in connection with this development — specifically identifying any works proposed on Banksia Close, Wood Street, Avalon Avenue, Cullen Street or Hallam Avenue — and given that the preceding data centre in this precinct required 15 months of undisclosed water main works on these same streets, why have these works not been fully identified and assessed before determination?

Question 23: What is Goodman's assessment of the cumulative construction burden on the residents of Banksia Close — who have already absorbed continuous construction disruption from the preceding data centre and its associated 15 months of water main works — from an additional construction program of between 24 and 34 months of demolition, excavation and major construction?

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8. The Compliance Framework Has Demonstrably Failed at the Adjacent Facility

The Department is being asked to replicate, for a facility 25 metres from my property, the same assessment and compliance framework used for the existing data centre in this precinct — assessed by the same acoustic consultants using the same methodology.

The documented outcomes at that facility, confirmed by independent reporting (*In the Cove*, 28 April 2026) and Lane Cove Council's formal submission of 20 April 2026:

- Phase 1 — just 25% of the consented facility — operates **5 dB(A) louder** than the noise predicted for all four phases combined. Chiller fans run at 60% load, not the assumed 35%.

- Operational noise exceeds the 43 dB(A) night-time limit by **11 dB(A)** at receivers more than **150 metres** from the facility.
- Noise verification reports required within 12 months of Phase 3 commencing operation in August 2024 had not been received by the Department as of April 2026 — approximately 9 months past the deadline.
- The Long Term Environmental Management Plan, required before 2021 operation commenced, has not been submitted — **five years overdue**.
- A representation was made to NSW Planning in 2023 that a revised Fire Safety Study had been submitted. FRNSW formally contradicted this in writing in July 2025.
- NSW Planning is the **sole compliance regulator**. The EPA holds no environment protection licence.

The NVIA for this application uses the same indicative-plant methodology that underestimated that facility's Phase 1 noise by 5 dB(A) relative to the full-facility prediction. My property is 25 metres from this proposed facility.

Question 24: The existing data centre in this precinct — assessed by the same acoustic consultants using the same indicative-plant methodology — operates 11 dB(A) above its night-time noise limit at receivers more than 150 metres away. What is Goodman's explanation for why the residents of Banksia Close, at 25 metres, should have greater confidence in the noise predictions for this facility than the residents near the adjacent facility had reason to place in theirs — and what consequence would actually apply to Goodman if this facility produces the same outcome?

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9. Cumulative Impacts Have Not Been Properly Assessed

Lane Cove Council's submission identifies that approximately 40% of the Lane Cove West industrial zone is proposed to be occupied by data centres, and states the Department must consider impacts in totality. The cumulative number of diesel generators, the cumulative diesel storage, the cumulative water demand, the cumulative heat rejection, the cumulative low-frequency noise burden and the cumulative infrastructure demand of this cluster have never been assessed as a whole.

Question 25: If four data centres occupy approximately 40% of the Lane Cove West industrial zone — with cumulative diesel storage, generator counts, water demands and heat rejection that have never been assessed collectively — on what basis does the Department determine that approving this third facility is consistent with the long-term planning, infrastructure and environmental integrity of a precinct that directly adjoins residential homes, a major public park, a community nursery and a national park corridor? At what point does the cumulative data centre footprint trigger a precinct-level strategic assessment, and why has that threshold not been reached?

Question 26: The AQIA acknowledges that emergency concurrent generator operation across the precinct "may result in significant cumulative air quality impacts." This analysis was prepared on the basis of existing and approved facilities. Has any assessment been conducted of the cumulative emergency air quality impact if all generators across all four proposed data centres operate simultaneously during a grid outage — and if not, why not?

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10. Mitigation Is Too Deferred to Support a Consent Now

This application repeatedly relies on future management plans, later detailed design, future tenant requirements, future operator controls and post-approval verification. For the most immediately affected residential property in this application — at 25 metres and 6.3 metres from the site boundary — that deferral places the burden of uncertainty on residents rather than on the applicant.

Question 27: This application relies on a compliance framework in which the most significant operational impacts — noise character, plant selection, generator fuel mix, emergency response, air quality during testing — are left to future tenant decisions, future detailed design and post-approval management plans. Given that the adjacent facility in this precinct demonstrates exactly what happens when compliance is verified after rather than before operation commences, why should the residents of Banksia Close bear the risk of that deferral at 25 metres from this facility — and on what basis should the Department grant consent before those impacts are known?

Question 28: Which mitigation measures in this application are legally binding consent conditions and which are recommendations, aspirations or statements of intent dependent on future decisions by future tenants? For each impact on residential receivers in NCA01, NCA02 and NCA03 that is deferred to future management, what is the binding mechanism that protects those residents if the future management plan produces an inadequate outcome?

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

The NSW Data Centre Consultation Paper (Infrastructure NSW, 27 March 2026) establishes five principles for sustainable and equitable data centre investment. The consultation closes on 8 May 2026 — three days after this submission deadline. The NSW Government is in the middle of acknowledging that the current framework is inadequate, at the precise moment the Department is being asked to use that framework to approve this application.

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

Principle 2 — Developers fund infrastructure without increasing costs for households. Sydney Water's feasibility letter (Appendix KK, Appendix B) states it has not allocated capacity and that capacity "may have been fully utilised by the time you obtain a Consent." Ausgrid has not confirmed final supply capacity. The Consultation Paper warns that data centres "are likely to use the spare water infrastructure capacity built to service future customer demand, like households." All utility negotiations are deferred to post-approval. The preceding data centre in this precinct provides the documented consequence of this approach: 15 months of water main construction on residential streets not disclosed at assessment, not serving any household, not applicable to this new facility.

Principle 3 — Efficient and sustainable use of resources. The Consultation Paper states data centres "should utilise recycled water where feasible." This proposal draws entirely from potable supply with no recycled water assessment. The Consultation Paper specifically identifies management of clustering near schools and residential areas, and diesel generator health impacts, as areas where existing frameworks are insufficient. This proposal places 49 generators within 25 metres of homes and 160 metres of a school. No on-site renewable energy generation is proposed in the EIS as lodged.

Principle 4 — Reliable and transparent data. The Consultation Paper requires reliable and transparent data from data centres. This EIS presents four different power capacity figures, a noise baseline contaminated by undisclosed construction works, a Social Impact Assessment describing a building 57% shorter than proposed, and at minimum 24 confirmed internal inconsistencies across 46 appendices. This is not reliable and transparent data.

Principle 5 — Planning settings must account for location and community needs. The Consultation Paper states "noise and pollution impacts are more pronounced on these sites, particularly when multiple data centres are clustered in a single location in close proximity" and that "greater flexibility should apply where infrastructure and resources are less constrained." Lane Cove has an existing data centre with documented noise non-compliance, confirmed water supply limitations, confirmed power reliability problems (third worst in NSW per PSS Distributors, December 2024), and a precinct already at approximately 40% data centre saturation (Lane Cove Council submission, 20 April 2026). Principle 5, correctly read, demands more rigorous scrutiny in constrained, sensitive and already-clustered locations — not less.

Question 29: The NSW Data Centre Consultation Paper identifies each substantive failure documented in this submission — clustering near schools and residential areas, diesel generator health impacts, recycled water obligations, infrastructure cost-shifting, and unreliable data — as areas where the current planning framework is inadequate and needs to change. Can Goodman demonstrate, with specific reference to each of the five principles, that this proposal meets the NSW Government's own stated expectations for sustainable and equitable data centre investment — and if it cannot, on what basis should the Department approve it now, under a framework the Government has publicly acknowledged must be replaced?

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12. Master Discrepancy Question

Appendix 1 to this submission identifies 24 confirmed internal inconsistencies across the 46 documents comprising this EIS — including incompatible figures for building height, power capacity, construction duration, residential proximity, generator testing hours, tree removal, canopy coverage and diesel storage arrangements, as well as an identification of the wrong country and the wrong council in the Noise Assessment.

Question 31: Before the Department determines this application, will Goodman provide a single definitive, independently certified design basis register that: identifies the correct figure for every material parameter across all 46 documents; certifies which figure was used as the input to each technical assessment; identifies which assessments produce unreliable conclusions as a result of having used an incorrect parameter; and is signed by a single responsible engineer or project director who accepts professional accountability for its accuracy? If Goodman cannot provide this, on what basis does it assert that the technical assessments in this EIS are reliable enough to support a consent?

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13. Conclusion: This Application Should Be Refused

I have advanced eleven grounds in this submission and asked 31 questions that Goodman must answer with specificity in its Response to Submissions.

The document suite is unreliable. Twenty-four confirmed internal inconsistencies — including on the height of the building, the power at which it will operate, the duration of construction, the distance to the nearest home, the hours of diesel engine operation, the number of trees removed and the country and council in which the site is located — demonstrate that this application does not present a coherent account of what is being proposed. A consent granted on this basis would be built on parameters that the applicant's own consultants cannot agree on.

The Clause 4.6 instrument is legally defective. It justifies the wrong development standard, advances commercial rather than planning grounds, and characterises an exceedance of between 57% and 83% at a 6.3-metre residential setback as a small variation. A valid Clause 4.6 request has not been provided.

The most directly affected property has not been assessed. Our property on Banksia close, within 30 metres of the proposed facility — has not received a single property-specific assessment across 46 documents.

The compliance framework has demonstrably failed at the adjacent facility. The same methodology, the same consultants, the same post-approval verification approach: already producing 11 dB(A) of noise non-compliance at receivers six times further away than my property. Approving this application under the same framework is not a manageable risk — it is a predictable outcome.

The NSW Government's own Consultation Paper confirms the framework is inadequate for facilities of this scale, in precincts of this sensitivity, with this level of clustering. Approving this application now — before those reforms are made, on an unreliable document suite, in a location where the same framework has already failed — would set a precedent that directly undermines the policy reform the NSW Government is in the process of designing.

I ask the Department to refuse this application.

APPENDIX 1 Cross-Document Discrepancy Register SSD-82052708 — Proposed Data Centre, 12 Mars Road, Lane Cove

Date: May 2026

This register documents confirmed internal inconsistencies identified across the 46 documents comprising the Environmental Impact Statement for SSD-82052708. Each discrepancy is cited with specific document, section and table references where available. All figures are taken directly from the source documents as lodged on the NSW Planning Portal.

The register is organised into six categories:

- Category A: Critical Parameter Inconsistencies (figures that directly drive technical assessments)
- Category B: Legal Instrument Errors (errors in the Clause 4.6 Variation Request)
- Category C: Cross-Reference and Attribution Errors
- Category D: Design and Measurement Inconsistencies
- Category E: Social Impact and Engagement Errors
- Category F: Infrastructure and Resource Inconsistencies

CATEGORY A: CRITICAL PARAMETER INCONSISTENCIES

These inconsistencies concern the fundamental design parameters on which all technical assessments depend. Where different consultants have used different figures, at least some technical assessments must be based on an incorrect input parameter.

A1 — Maximum Building Height

Document	Section/Table	Maximum Height Stated
Main EIS	Table 9, Section 3.4.1	**28.3 metres**
Appendix OO — Clause 4.6 Variation Request	Section 3, Section 11	**28.3 metres**
Appendix T — Air Quality Impact Assessment	Table 2	**33 metres**
Appendix H — Architectural Design Report	Per Lane Cove Council submission, 20 April 2026	**33 metres**

Impact: The Clause 4.6 Variation Request — the legal instrument justifying the height exceedance — uses 28.3 metres. If the correct maximum is 33 metres, the variation understates the exceedance of the 18-metre standard by 26 percentage points (57.2% vs 83.3%). All shadow diagrams, visual impact assessments, and planning grounds in Appendix OO are based on an incorrect height. A consent condition specifying a maximum height of 28.3 metres cannot be enforced if the building has been designed to 33 metres.

Exceedance at 28.3m: 57.2% above the 18m LEP standard **Exceedance at 33m:** 83.3% above the 18m LEP standard

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A2 — Power Consumption Capacity

Document	Section/Table	Power Figure
NSW Planning Portal project description	—	**90 MW**
SEARs application	—	**90 MW**
Sydney Water Feasibility Letter (Appendix KK, Appendix B)	—	**90 MVA**
Main EIS	Section 1.2	**81 MW**
Appendix OO — Clause 4.6 Variation Request	Section 11(c)	**81 MW**
Appendix T — Air Quality Impact Assessment	Table 2	**60 MVA / 60 MW**

Impact: The Air Quality Impact Assessment — which models all generator emissions, predicts NO_2 concentrations, and determines whether air quality criteria are met — was prepared for a 60 MW facility. The application seeks consent for 81 MW. The facility is described to Sydney Water and on the Planning Portal as 90 MW. NO_2 exceedances admitted in the emergency scenario (Appendix T, Table 14) were modelled at 60 MW and will be proportionally higher at 81–90 MW. The SEARs was issued on the basis of 90 MW, not 81 MW.

A3 — Construction Duration and Commencement Date

Document	Section	Duration	Commencement
Main EIS	Section 3.9	**24 months**	**Q1 2026**
Appendix KK — Infrastructure Report (HDR)	Section 2.7	**34 months**	**Q1 2027**

Impact: A 10-month discrepancy in construction duration and a 12-month discrepancy in commencement date between the document presented to decision-makers and the document used to plan utility provision. The main EIS states a commencement date that had already passed at the time of lodgement in March 2026. The Construction Noise and Vibration Management modelling, Construction Traffic Management Plan, and Social Impact Assessment are each based on one or the other of these figures — meaning they cannot all be reliable.

Additional duration discrepancy to operations: Main EIS states 24 months from Q1 2026 = operational Q1 2028. Appendix KK states 34 months from Q1 2027 = operational Q4 2029. Difference: approximately 21 months to when the facility begins operating.

A4 — Distance to Nearest Residential Receivers

Document	Section	Distance Stated
Main EIS	Tables 5, 9	**50 metres east**
Appendix T — Air Quality Assessment	Section 2.2	**50 metres east** (Wood St); **50 metres north** (Banksia Close — directionally incorrect)
Appendix O — Traffic Assessment	Section 3.1	**200 metres east** (Banksia Close)
Appendix DD — Waste Management	Section 2.0	**200 metres east** (Wood St); **250 metres north** (Banksia Close)
Appendix KK — Infrastructure Report	Section 1.0	**200 metres east** (Wood St); **250 metres north** (Banksia Close)
Appendix U — Noise and Vibration Assessment	Table 2, NCA02	**25 metres east**

Impact: The traffic assessment, waste management plan, and infrastructure report — prepared by three different consultants — each place the nearest residential receivers at 200–250 metres. The acoustic consultant's site measurement confirms the nearest receiver is 25 metres. These three documents have been prepared on a receiver distance that is eight to ten times the measured distance, fundamentally affecting all operational management controls they specify.

Additional error: Appendix T describes Banksia Close as being to the **north** of the site. Banksia Close is to the **east**. This directional error affects wind dispersion modelling for generator emission plumes, incorrectly identifying which residential receivers are most exposed.

A5 — Annual Generator Testing Hours

Document	Section/Table	Testing Hours
Main EIS	Table 11	**122.5 hours** (excluding cooldown)
Appendix T — Air Quality Impact Assessment	Section 1.4.1	**155.2 hours** (including cooldown)
Appendix KK — Infrastructure Report	Table 3	**155.2 hours**
Appendix JJ — Social Impact Assessment	Section 6.2.5.2	**155.2 hours**

Impact: The air quality compliance conclusions — including predicted NO_2 concentrations at all receptors — are based on 155.2 hours of annual diesel generator operation. The main EIS presents 122.5 hours to decision-makers. The 32.7-hour gap represents additional diesel combustion, additional emissions, and additional noise impacts on residential receivers during hours that a consent condition based on the main EIS figure would not capture. The gap is 26.7% above the figure stated in the main EIS.

A6 — Trees to be Removed

Document	Section	Trees Removed
Main EIS	Table 9, throughout	**90 trees**
Appendix MM — Arborist Report / Landscape Report (Oculus, per SIA Section 6.2.2.1)	Section 6.2.2.1	**82 trees**
Appendix JJ — Social Impact Assessment	Section 6.3	**121 trees**, including 7 Category A high-retention-value trees

Impact: The Social Impact Assessment — prepared by the same firm (Urbis) as the main EIS — records 31 more trees being removed than the main EIS states. An 8-tree discrepancy between the main EIS and the Arborist/Landscape Report is also unreconciled. The SIA (Section 6.3) expressly acknowledges that proposed canopy cover of 24.7% does not meet the Lane Cove DCP's 35% requirement for industrial developments — an admitted DCP non-compliance absent from the main EIS.

A7 — Total Trees Surveyed on Site

Document	Figure
Main EIS Table 5 / Appendix MM — Arborist Report	**222 trees**
Appendix N — Visual Impact Assessment, Section 3.4	**216 trees**

Impact: The VIA's visual screening analysis and its conclusions about the "small and constrained visual catchment" rely on a vegetation count 6 trees lower than the arborist's count. The VIA photomontages also rely on existing vegetation without distinguishing between retained trees and the 82–121 trees proposed for removal.

A8 — Deep Soil Area

Document	Section	Deep Soil Area	Percentage
Main EIS	Section 3.4.5	**8,417.5 m²**	25.1%
Main EIS	Table 9	**8,391 m²**	25%
Appendix T — Air Quality Impact Assessment	Table 2	**8,390 m²**	—
Appendix Y — Stormwater Report	Table 1	**8,422 m²**	—

Impact: Four different figures for deep soil area across the same application. The DCP requires 20% minimum deep soil coverage for industrial developments; DCP compliance depends on which figure is accepted as definitive.

A9 — On-Site Detention Maximum Discharge Rate

Document	Section	OSD Discharge Rate
Main EIS	Section 3.5	**358.8 L/s**
Appendix Y — Stormwater Management Report (BG&E)	Section 1.0, Section 6.1	**353.8 L/s**

Impact: A 5 L/s discrepancy between the summary document and the specialist stormwater report. The stormwater consultant is the primary author of this figure; the main EIS has transcribed it incorrectly.

CATEGORY B: LEGAL INSTRUMENT ERRORS

B1 — Clause 4.6 Variation Request: Wrong Development Standard Referenced

Location: Appendix OO, Section 11 (Are there sufficient environmental planning grounds to justify contravening the development standard?)

Error: Section 11 opens: *"As set out below, the extent of the **FSR variation** is supportable on the following environmental planning grounds..."*

The variation sought is for **height** under Clause 4.3. No FSR variation is sought. The proposed FSR of 0.65:1 complies with the 1:1 maximum under Clause 4.4. The legal justification for the height variation refers throughout Section 11 to justifying an FSR variation.

Impact: Under *Initial Action Pty Ltd v Woollahra Council* [2018] NSWLEC 118 — cited by Appendix OO itself — the grounds in a Clause 4.6 request must justify contravening the specific development standard being varied. A document that identifies the wrong standard in its operative section has not met this requirement.

B2 — Clause 4.6 Variation Request: Commercial Ground Not a Planning Ground

Location: Appendix OO, Section 11(c)

Error: The primary substantive ground advanced is: *"A 81MW building targets hyperscale operators..."*

Impact: This is a commercial ground. The objectives of Clause 4.3 are solar access, privacy and visual impacts on neighbouring properties, alternative design solutions to maximise public domain sunlight, and relationship to topography. The commercial requirements of hyperscale operators engage none of these objectives.

B3 — Clause 4.6 Variation Request: Mischaracterisation of Scale of Variation

Location: Appendix OO, throughout

Error: The Clause 4.6 Variation Request characterises the height variation near the eastern boundary as "only a very small variation." The eastern boundary is 6.3 metres from residential properties on Banksia Close. The building at this interface reaches between 28.3 metres and 33 metres — a height exceedance of between 57.2% and 83.3% of the 18-metre standard.

B4 — Clause 4.6 Variation Request: Height Figure Inconsistent with Technical Appendices

Location: Appendix OO, Section 3 and throughout

Error: Appendix OO uses 28.3 metres as the maximum height throughout its justification. Appendix T (AQIA, Table 2) and Appendix H (Architectural Design Report) state the maximum height is 33 metres. The Clause 4.6 justification is prepared on the basis of a height figure that two of the applicant's own consultants do not use.

CATEGORY C: CROSS-REFERENCE AND ATTRIBUTION ERRORS

C1 — Landscape Appendices Transposed in Appendix A

Document	Appendix J	Appendix K
Main EIS Table 4	Landscape **Plans** (Oculus)	Landscape **Report** (Oculus)
Appendix A — SEARs Compliance Table, Item 7	Landscape **Report**	Landscape **Plans**

Impact: J and K are reversed in the SEARs compliance document. A reviewer following Appendix A to verify landscape assessment will open the wrong document.

C2 — Aboriginal Cultural Heritage Report Cross-Referenced to Wrong Appendix

Document	Stated Location of ACHAR
Main EIS Table 4	Appendix **HH**
Main EIS Table 5, Aboriginal Archaeology row	*"Appendix **FF**"*

Impact: Appendix FF is the Dangerous Goods Report (RiskCon), not the heritage report. A reviewer following the Table 5 reference to find the heritage assessment will open the wrong document.

C3 — Sydney Water Engagement Attributed to TfNSW

Location: Main EIS, Table 3 (Agency Engagement)

Error: The Sydney Water row states Goodman *"emailed TfNSW to notify them that an SSD application is being prepared."* This is a verbatim copy-paste from the TfNSW row immediately above. Sydney Water was the intended recipient, not TfNSW.

C4 — Wrong Country and Wrong Council in Noise Assessment

Location: Appendix U — Noise and Vibration Impact Assessment (SLR Consulting, 2026), Section 1.1

Error: *"The site is located on Country of the **Gadigal people** within the local government area of **Bayside Council**."*

The site is on Cammeraygal Country within Lane Cove Council's local government area. The Gadigal people are the traditional custodians of inner Sydney's south shore. Bayside Council covers the Botany Bay area — Mascot, Wolli Creek and Rockdale.

Impact: This is verbatim text from a different project, confirming the NVIA was recycled from another application with site-specific content incompletely substituted. This raises fundamental questions about the site-specificity of all monitoring, receiver identification, meteorological inputs and modelling contained in the document.

CATEGORY D: DESIGN AND MEASUREMENT INCONSISTENCIES

D1 — "Significant Landscape Setback" vs Actual Eastern Setback

Document	Description
Main EIS Table 5	*"There is a **significant landscape setback** that separates the site from low-density residential development"* (eastern boundary)
Main EIS Table 9	Eastern setback: **6.3 metres to 10 metres**

Impact: A 6.3-metre setback for a building of 28.3–33 metres (height-to-setback ratio of 4.5:1 to 5.2:1) cannot credibly be described as a significant setback. This characterisation misrepresents the residential interface to decision-makers.

D2 — Construction Commencement Date Already Passed at Lodgement

Location: Main EIS, Section 3.9

Error: *"It is anticipated that construction will commence in Q1 2026."* The EIS was lodged on 18 March 2026, within Q1 2026, with public exhibition running to 28 April 2026. Consent had not been granted. The stated commencement was impossible at lodgement and was not corrected.

D3 — Gross Floor Area: SEARs vs Application

Document	GFA
SEARs application / press / portal descriptions	**18,829–18,830 m²**
Appendix OO — Clause 4.6 Variation Request	**21,832 m²**
Appendix JJ — Social Impact Assessment	**21,832 m²**

Impact: The GFA in the formal lodged documents is approximately 3,000 m² larger than the GFA in the SEARs. This is a 16% difference. Section 7.11 developer contributions under the Lane Cove LEP are calculated on GFA. The SEARs was issued on the basis of a materially smaller building than is now proposed.

D4 — Diesel Storage Configuration: Three Contradictory Descriptions

Document	Diesel Storage Description
Appendix KK — Infrastructure Report	Approximately **8 in-ground bulk fuel storage tanks**
Appendix H — Architectural Design Report	**Above-ground diesel storage tanks**
Engagement Outcomes Report	**Steel tanks in a 4-hour fire-rated, bunded room with alarmed leak detection**

Impact: Three materially different diesel storage configurations are described across three documents. In-ground tanks, above-ground tanks, and a fire-rated bunded room have different fire risk profiles, different spill containment mechanisms, and different emergency response requirements. The fire safety, dangerous goods, and emergency planning assessments cannot all be reliable if they were prepared on different assumptions about the storage configuration.

CATEGORY E: SOCIAL IMPACT AND ENGAGEMENT ERRORS

E1 — Building Height Stated in SIA: 18 Metres (Permitted Height, Not Proposed Height)

Location: Appendix JJ — Social Impact Assessment, Section 1 (Introduction)

Error: *"The Proposal will include an approximately **18-metre-tall building**..."*

The permitted height under the Lane Cove LEP 2009 is 18 metres. The proposed height is 28.3–33 metres. The community consultation underpinning the entire SIA was conducted on the basis of a building described at the permitted height.

Impact: Every community finding in the SIA — including visual impact, solar access, overshadowing, neighbourhood character and amenity — was formed on the basis of a building description that is between 57% and 83% shorter than what is actually proposed.

E2 — Facility Operating Hours: Community Newsletter States "25 Hours a Day"

Location: Appendix JJ, Appendix A — Community Newsletter

Error: *"If approved, the data centre would operate **25 hours a day**, 7 days a week."*

Impact: A typographical error in the primary public-facing document distributed to 1,144 properties was not corrected or followed up.

E3 — Construction Employment: 350 FTE (SIA) vs 200 FTE (Main EIS)

Document	Construction Employment
Main EIS Table 9	200 FTE
Appendix JJ — Social Impact Assessment, Section 6.2.7.1	350 FTE

Impact: A 75% discrepancy on the headline positive social impact of the proposal. The SIA assigns the highest possible positive rating ("High positive," "almost certain likelihood") to a construction employment figure that directly contradicts the main EIS prepared by the same firm.

E4 — SIA Data Cut-Off: 11 December 2025 Despite February 2026 Sign-Off

Location: Appendix JJ — Social Impact Assessment, Chapter 2 (Methodology)

Error: *"This report is dated **11 December 2025** and incorporates information and events up to that date only."* The report was signed on 17 February 2026 and lodged in March 2026.

Impact: By the date of formal lodgement, Lane Cove Council had prepared a detailed 40-page formal objection. Over 800 residents had signed a petition in opposition. The AirTrunk compliance failures had been publicly documented. None of this was incorporated into the SIA, which expressly states it was "completed" more than two months before it was actually signed.

E5 — Survey Response Data: Headline Figure Understated in SIA Narrative

Location: Appendix JJ, Chapter 4 (SIA Field Study)

Error: The SIA narrative and summary tables describe the negative impact finding using various phrasings. The survey data (Question 4) records that **85.7%** of respondents (42 of 49) anticipated negative community impact — a more significant finding than the softer characterisations used elsewhere in the SIA.

Additional survey findings from the SIA's own data:

- 76.9% (30 of 39): no positive impact
- 45.8% (22 of 48): proposal should be relocated
- 47.2% (17 of 36): proposal should not be approved or developed

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CATEGORY F: INFRASTRUCTURE AND RESOURCE INCONSISTENCIES

F1 — Sydney Water: Capacity Not Confirmed, No Allocation Made

Location: Appendix KK, Appendix B — Sydney Water Feasibility Letter (8 May 2025)

Key statements from Sydney Water's own letter:

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

Characterisation in main EIS: "Ongoing consultation with Sydney Water."

Impact: Sydney Water's own letter states it has not allocated capacity and cannot guarantee any will exist at consent date. The main EIS characterises this as ongoing consultation, materially understating the position.

F2 — Ausgrid: Supply Capacity Not Confirmed

Location: Appendix KK, Section 2.1

Error: *"Ausgrid will advise the **final day supply capacity** and route options from to the proposed site."*

Impact: Ausgrid supply capacity is not confirmed. The substation design is described as indicative and subject to ASP design approval post-consent.

F3 — NO_2 Exceedances Admitted in Emergency Scenario, Mitigation Is Notification Only

Location: Appendix T — Air Quality Impact Assessment, Table 14

Error: The AQIA admits NO_2 1-hour criteria exceedances at multiple receptor locations during emergency concurrent generator operation. The sole proposed mitigation is notification to neighbouring properties.

Impact: An admitted air quality exceedance at receptors including residential properties, Lane Cove West Public School (160m) and a childcare centre, mitigated only by issuing a notification after the exceedance has already occurred.

Summary Table

Reference	Category	Parameter	Discrepancy
A1	Critical	Building height	28.3m vs 33m (EIS/OO vs Appendix T/H)
A2	Critical	Power capacity	60MW / 81MW / 90MW / 90MVA across 5 documents
A3	Critical	Construction duration	24 months Q1 2026 vs 34 months Q1 2027
A4	Critical	Distance to nearest residential	25m / 50m / 200m / 250m across 6 documents

Reference	Category	Parameter	Discrepancy
A5	Critical	Generator testing hours	122.5 hrs (main EIS) vs 155.2 hrs (modelling)
A6	Critical	Trees removed	82 / 90 / 121 across 3 documents
A7	Design	Trees surveyed	222 (arborist) vs 216 (VIA)
A8	Design	Deep soil area	4 different figures across main EIS and appendices
A9	Design	OSD discharge	358.8 L/s (main EIS) vs 353.8 L/s (Appendix Y)
B1	Legal	Clause 4.6	FSR variation referenced instead of height variation
B2	Legal	Clause 4.6	Commercial ground, not planning ground
B3	Legal	Clause 4.6	57–83% exceedance described as "very small variation"
B4	Legal	Clause 4.6	28.3m used in OO; 33m in Appendix T and H
C1	Cross-ref	Appendix A	Landscape appendices J and K transposed
C2	Cross-ref	Main EIS Table 5	ACHAR located in Appendix FF not HH
C3	Cross-ref	Main EIS Table 3	Sydney Water email attributed to TfNSW
C4	Cross-ref	Appendix U	Gadigal Country / Bayside Council (wrong country, wrong council)
D1	Design	Eastern setback	"Significant landscape setback" vs actual 6.3m
D2	Design	Construction start	Q1 2026 start date impossible at lodgement
D3	Design	Gross floor area	18,829m² (SEARs) vs 21,832m² (lodged application)
D4	Design	Diesel storage	3 contradictory configurations across 3 documents
E1	SIA	Building height	SIA describes 18m building (permitted), not 28.3–33m (proposed)
E2	SIA	Operating hours	Community newsletter states "25 hours a day"
E3	SIA	Construction jobs	350 FTE (SIA) vs 200 FTE (main EIS) — same author firm
E4	SIA	Data currency	SIA cut-off 11 Dec 2025; signed 17 Feb 2026; lodged March 2026
E5	SIA	Survey data	85.7% negative impact finding not prominently reflected in conclusions
F1	Infrastructure	Water supply	Sydney Water: no capacity allocated, may not exist at consent date

Reference	Category	Parameter	Discrepancy
F2	Infrastructure	Electricity supply	Ausgrid: final supply capacity not confirmed
F3	Infrastructure	Air quality	NO_2 exceedances admitted in emergency scenario; notification only mitigation

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This register was compiled from direct review of the documents as lodged on the NSW Planning Portal for SSD-82052708. All citations are to specific sections and tables within the lodged documents. The register does not include errors that could not be confirmed directly from the source documents.