

4 May 2026

Mr Patrick Copas
NSW Dept of Planning, Housing & Infrastructure
RE: SSD 82052708

I formally object to the above proposal. The Proposal contains many conclusions drawn from insufficient community engagement, impact assessments (many which are drawn from modelling that relies on information that is assumed but not verified). I believe the Proposal is incomplete and that a determination cannot be reached based on the information submitted.

When the EIS has been re-addressed, I recommend that the Proposal be directed to the Independent Planning Commission or that it be paused, pending the results and recommendations of the Parliamentary Inquiry into NSW Data Centres due to the ethical and public safety considerations of positioning a 90MV data centre in close proximity to young children and residents.

The location of a 81 to 90MV (capacity is not consistently stated throughout the EIS package) data centre is proposed to be placed:-

- within 16 metres of residential homes (16 metres being the closest side boundary to 10 Banksia Close),
- bordering on Conservation Zone C2 along the entirety of its southern and eastern border,
- in close proximity to Blackman Park, a key Recreation Zone in the locality of Lane Cove, with hundreds of school aged children playing club sports every week, together with visiting schools and clubs from the Lower North Shore
- within 160m of a primary school which educates children as young as 4.5 years to 12-13 years,
- the school above also has an Out of School Hours facility managed by Helping Hands which sits on the school grounds, extending hours of school for the attendees. Hours of operation 7am to 9am, and 3.25pm to 6.15pm. This facility also operates on school holidays, with full duration of hours approx. 7am to 6pm.
- East of the site lies the Conservation Zone, and North East of the 12 Mars Road (Proposed Site for Project) lies a long strip of Recreation Zone with north/south orientation behind homes. This is situated between the Industrial Estate and R2 homes on Avalon Avenue and considered a vital wildlife corridor linking access to natural parks and bushland for our native fauna. There is repeated evidence of brush turkeys, possums, and recently (last week) a visiting Powerful Owl was heard from Avalon Ave residences and Cullen Street residences. A fox was also sighted on Blackman Park oval in the same week.

My key concerns are listed below relate mainly to harmful impacts:-

1. Noise
2. Air
3. Environmental
4. Safety (fire, traffic hazards)
5. Insufficient communication process throughout
6. Visual Impact

List of Concerns and Discussion

Point 1 – Communication concerns

In the Request for SEARS dated 18 March 2025, Goodman has stated:-

“The generators, ...will be located along the site’s western boundary, away from the residential receivers to the east. This will limit noise and air quality impacts resulting from the generators if activated”

In the Preliminary Architecture Plans Appendix A dated 10/3/25 the generators are shown on West, South and East of the buildings, and in Architectural plans dated December 2025 Appendix B, the generators are shown on East through to Western sides.

The generator locations in Architectural Plans in Appendix A **were not described** in the **Request for Sears letter dated 18 March 2025**, even though they were in existence (dated 10/3/25).

Why were the generator locations changed from the West (in above Sears Letter) to the now proposed West in Building B, and East to West in Building C, at close range to sensitive receivers (residential homes in Wood Street)?

There is no explanation in the EIS for the public and Planning Authorities to understand the change in location or the inaccuracy of the SEARS letter.

It is also unclear as to whether the internal floor plan of the data centre was presented at webinars and in person meetings, because there is no record of it on the EIS.

Point 2 – Communication concerns

In the Request for SEARS dated 18 March 2025, it is stated 12 Mars Road, (the Site) is bounded as follows:-

“**South:** Significant landscape buffer. Beyond is the Lane Cove Council Depot, for storage of Council vehicles, and the Blackman Park Grounds. Land to the south zoned RE 1 – Public Recreation.

- **East:** Significant landscape setback of approximately 50m, followed by low density residential development. Land to the east zoned R2 – Low Density Residential.”

The referenced “significant landscape buffer” actually constitutes a small area (with variable distances to the south boundary, and in sections would not be considered significant in size, particularly on the **South East** corner boundary) of Proponents

own land, then immediately to the South of the Site is in fact a **Conservation Zone C2** according to Lane Cove Council Planning Maps.

To the south of this Conservation Zone is Blackman Park **Recreation Zone RE1**.

To the east of the Site, is Residential Zone R2 Low Density and the closest home is 16 metres boundary to boundary to the Site being at 10 Banksia Close, Lane Cove West.

Corrections should be made, in an Amended EIS and corresponding documents.

Point 3 Impacts – Does not meet Development Outcomes

In the EIS Page 7, Table 1 Summary of Development Outcomes

In this table, it is stated the following:-

“The project minimises impacts on the natural environment

The project minimises impacts on the built environment

The project has positive social impacts

The project has positive economic impacts”

a)It is also stated in the Table that “The site is suitable for the project.”

The site is located within 16-20metres of the nearest residential home (boundary to boundary) at 10 Banksia Close. The site borders Conservation Zone to the East. The site is located approx. 50 metres of the nearest home on Wood Street. The site is located approx. 160 metres from a Lane Cove West Public school, a primary school for young children.

There is omission of sensitive receivers in the EIS page 18, of Conservation Land immediately to the south and east of the Site, and also that the closest residential properties begin from **16** metres to the East of the Site boundary to boundary.

Amended EIS documentation should reflect this as the documentation could be construed as misleading.

Intention of the legislation

Data centres fall under the classification of Light Industries (quote legislation) and this has been relied upon in the Proposal as allowed on E4 Zoned land.

Due to the size and capacity of the Proposal exceeding 15MV, and being deemed State Significant Development, can data centres still be classified Light Industry anymore, particularly given their

*significant use of water and energy, (using combined 100billion litres of water annually for cooling systems and expected to triple by 2030 -

<https://www.sustainablelivingguide.com.au/how-data-centres-are-draining-australias-water-and-what-we-can-do-about-it/>),

*requirements for **improvements to existing** infrastructure that affect locations in the LGA creating significant disruption to the community (eg Lane Cove West has experienced 15 months of disruption, roads opened and closed daily – which is not considered efficient, and **hazards** to families with young children).

*significant impact on communities

Many data centres in recent times, have required upgrades since their original approval eg NEXT DC in Artarmon, and AirTrunk in Lane Cove West. The EIS mentions the design has been optimised and considered future scalability, yet no details have been provided of the envisioned maximum scaled size.

The operating nature and the desired ability to service their clients with improved speed and reliability mean that the data centre is a living and significantly impacting **mechanical industrial** presence, which cannot be viewed as Light Industry anymore.

Bush Fire Risks & Fire Risks

(A) EIS Section 6.11.11 page 124

Incorrect description site of site, once again **omitting** (unclear and inaccurate communication) **material** information such as the site being located within 16metres of the nearest residential home (boundary to boundary) at 10 Banksia Close. The site borders Conservation Zone to the East. The site is located within 50 metres of the nearest home on the north side of Banksia Close. The site is located approx. 160 metres from a public school. These are all missing from the EIS.

(B) Fire Safety Concept Strategy dated February 2026 – Appendix NN

In Section 3.1 Site context incorrectly states “the closest residential uses are to the east at Wood Street 200metres, and 250 metres to the north at Banksia Close.”

There is also no mention of the Lane Cove West Public School, which should be considered as there are approx. 500 children attending between the ages of 4.5years to 13 years, as well as on-site OOSH facility extending hours to 7-9am, and 3.25pm – 6pm for those participating children.

I have mentioned previously that the nearest residential property on Banksia Close is 16metres away, boundary to boundary, and that the homes on Wood Street are approx. 50metres way, boundary to boundary.

Is the Fire Safety Concept Strategy report still valid given the above material facts being omitted? (unclear and inaccurate communication)

I note the report is dated February 2026 and cites sources of information dated December 2025. The Fire Concept Strategy report needs to be amended to reflect the correct distances of all sensitive receivers nearby as mentioned above.

A review of this report should be sought from our appropriate Local and State Fire Authorities, also with regards to the hazards of lithium and diesel stored and used on site, together with the cumulative impact of other data centres in the area given the close proximity to residential, recreational, conservation and educational facilities and the assessed ability to control any fires that have the potential to cause harm or damage inside and outside the site boundary.

I believe in the interests of **public safety**, it is imperative that this Review of the Proposal must be afforded to the State and Local Fire Authorities. Sydney Water should also be consulted for input on foreseeable events (and potential unforeseeable events) and resource availability eg in the event that any fire is not

able to be contained to the site and surrounding water pressure is not sufficient to prevent fire from spreading. All authorities need to consider the local geographic area, (homes, schools, conservation, recreation zones) as well as the cumulative effect of the existing and proposed Data Centres in Lane Cove and surrounding area eg the proposed Julius Ave data centre in North Ryde.

Cybersecurity

The proposed use of the Site so close to sensitive receivers is questionable given that the storage of sensitive data may become a target of cyber-attacks, not just via hackers or malware, but also physical damage. We have seen in recent weeks, the targeting of Amazon data centres across the world. What the data centre is storing and who for, is confidential. However, government authorities must ensure that the Site is appropriate given national security and other security issues and risks and close proximity to sensitive receivers in light of the current global climate.

It is appropriate to seek specific review of the site by Federal Authorities in relation to public safety, and potential cyber-attacks and national interest. (see Expectation 1 of Federal Government's expectations for Data Centres March 2026)

"Data centre operators should conduct their businesses in ways which work for the benefit of the Australian economy, people and their local communities. They should operate in good faith, delivering positive outcomes while minimising adverse effects on local communities wherever possible. They should seek opportunities to build and maintain social licence through open and constructive engagement with the communities they operate within. They should protect sensitive and personal data, prepare for threats and disruptions, and limit physical and digital access to their data centres to those with a right to it."

The local community is unclear as to how this data centre will benefit them.
The site is considered unsuitable for the project.

Point 4 – Social Impacts

(a) In the EIS Page 7, Table 1 Summary of Development Outcomes, it is also stated that "The site is in the public interest".

Whilst I acknowledge the benefits the Proposal will bring to the construction sector and IT, are the IT requirements urgent?

Does it prioritise Australia's National Interest? (see Federal Government Expectations of Data Centres and AI Infrastructure Developers March 2026 <https://www.industry.gov.au/publications/expectations-data-centres-and-ai-infrastructure-developers>)

The construction sector is already constrained by shortage of resources. The approval and construction of data centres would require a co-ordinated approach by government to ensure timely delivery of the anticipated project pipeline for both housing and industry.

The benefits to the local community have not been clearly identified and this may be evidenced by the number of objection submissions received in relation to this Proposal. The local community will lose around 210 full time jobs at the Site should this Proposal go ahead. Whilst I acknowledge around 260 construction

jobs will be created, this is temporary, and a diversion of resources from other viable projects as we face labour shortages in construction.
The net employment effect after development will be the loss of 184 full time positions.

Social Impact considerations:-

A summary of Goodman's findings and position are contained in Section 6.11.9 It was concluded there was Low negative impacts 'relating to access' for local businesses and residents. This does not include general negative impacts that are real and tangible. 210 local jobs would be lost. Businesses would need to re-locate. If those individuals were interviewed how many would say they have suffered enormous stress from the imminent relocation?

Has Goodman endeavoured to mitigate and reduce this impact by offering to re-train staff into areas of customer service, technical, security and/or other services required by the data centre? Have alternate rental premises been offered even for transitional periods? Have counselling resources been made available?

Disagree with the conclusion that Impact is Negligible with Mitigation as concluded on Page 34 of Appendix JJ.

The list of Mitigating measures that were recommended on page 123 of the EIS have not been commented on by Goodman as to which ones have been undertaken or that they intend to undertake. If no mitigating measures have been taken so far, it is not a Negligible Impact.

Social Impact Assessment – Appendix JJ page 4

Identifies the Lane Cove Football Club as the primary sporting club using the Blackman Park sports ground. This is not correct as there are 2 other sizeable and prominent clubs also use the grounds, Lane Cove Hunters Hill Cats AFL, and Lane Cove Cricket Club (who uses the ground in the alternate season to the 2 clubs mentioned). Blackman Park is used extensively all year around by the 3 clubs, together with visiting schools such as St Aloysius on a regular basis. The SIA has failed to identify other significant users of the park.

The SIA cannot be relied upon as an accurate assessment of impacts. Evidence of this may be seen by the number of objections that are likely to be submitted.

Other social impacts also arise from the Noise, Health & Environmental impacts as detailed below.

It cannot be concluded that the Project is in the public interest.

Point 5 Other Impacts - Noise, Air and Environmental

Major concerns arise from the Project demolition, construction, and ongoing operation.

Point 5A Noise Impacts

The Proposal to demolish and construct over Monday to Friday 7am to 6am, Saturday 9 – 1pm whilst it may be the most desired operating schedule for the Proponent, is not sympathetic to nearby residents, schoolchildren, users of

Blackman Park and surrounding bushland and the surrounding environment including the Conservation Zone adjoining the site.

Further considered mitigation of impacts need to be applied here.

The Proponent could look at limiting high impact activities such as demolition, rock crushing to those hours where children would be safe at school eg 9am-3.30pm and outside exposure would therefore be limited. This would also limit the exposure to the early morning walkers, of which there are many, who walk before work.

No impact has been considered for the users of Blackman Park who play sport after school (some start from 3.30pm) and through to 6pm and beyond. Soccer and cricket games take place every Saturday during the season with only a short transition period in between.

The Proponent could consider limiting the Saturday construction or keeping the work week to Monday to Friday given the high volume of walkers that also enjoy walking from their homes, to Blackman Park on a regular basis every Saturday.

Council workers and volunteers work every Friday and the first Saturday of every month at the community nursery on the adjoining C2 land, propagating native seedlings, nursing and care for the plants, administering a free native seedling programme for locals and businesses, holding **educational** workshops for **young** children. They perform a vital and essential role in the LGA which is critical for maintaining ecosystem balance in the area. They also help to provide plants which are used in regeneration projects throughout bushland and other conservation zones, providing shelter and habitat for native fauna, and also ensuring that tree canopy and microclimates can be maintained.

In light of this, the Proponent should consider how impacts can be mitigated so that this important work can continue and workers are safe from harmful noise.

Noise during operation

The operation of a 24/7 data centre will see the introduction of a continuous mechanical sound to the locale. The most sensitive receivers will be located at 10 Banksia Close, and along Wood Street, with the Lane Cove West Public School affected. Some noise would be expected to be heard at Blackman Park and I would also imagine noise to travel either downstream to areas around Penrose St and Myee Crescent where some residents are hearing humming noises now, which they believe could be coming from the AirTrunk facility at Apollo Place in the same Lane Cove West industrial estate.

I understand the Noise Impact assessment has been completed however it lacks the use of real generator noise and the generator model has not yet been chosen or committed to in the EIS. We need a more robust assessment for noise impacts. Special consideration should be placed as to Lane Cove Council's suggested receiver positions in their Submission response to the Proposal.

The noise study also does not assess cumulative impacts of the proposed data centres together with existing. If all 5 data centres should go ahead, the impact will be much louder than one data centre operating on its own.

The noise assessment should include a cumulative study or aggregate (in essence, an assessment of all 5 data centre generators operating in power out situations,

assessment of 1 data centre's generators operating in power out, and assessment of 5 data centres doing their generator testing based on submitted maintenance schedules (which is absent from the EIS for this Proposal) and rigorous rules around the timing of testing for all LCW (Lane Cove West) data centres, this which should be authored by with Lane Cove Council as they are best placed to manage this with their expert knowledge of the local community in order to minimise community and residential impacts.

With any cumulative or aggregate impact assessment, they need to include the proposed data centres at 16 Mars Road, and the AirTrunk expansion at Apollo and Sirius Avenues, making it 5 data centres in total.

It would be considered diligent to also include the Julius Ave Ryde Data Centre in any cumulative or aggregate analysis given its close proximity to the LGA and the sensitivity of receptors (children as young as 4.5years and infants at the residential homes).

Any assessment must also take into account that the existing noise levels are most likely already exacerbated by the data centres already in existence, and that any incremental analysis of new data centres may inadvertently include that background noise as baseline. This needs to be taken into account and perhaps a more accurate base would be to exclude the existing data centre noise that currently exist. This would provide for a more objective approach to assessment, as over time, if these are not excluded the baseline would just increase with each data centre being built.

24/7 operation and low dB

The Consent Authorities should consider the current planning framework in relation to the issues around noise and I would point out some recommended measures below, particularly in relation to the intersection of where quiet zones like RE1 and C2 exist and adjoin the E4 zone and site of Proposal.

“The main responses to reduce noise are through **building design**, public engineering works and **land use planning**. Examples of good architectural design of buildings to reduce noise include **orientation of buildings and habitable rooms away from the noise source**.

...

Examples of land use planning approaches include separating noisy transport routes from noise sensitive areas, managing traffic and reducing speed...to decrease noise.

...

The absence of unwanted sound (noise) is not necessarily quietness. In fact, natural background sounds in certain contexts can be seen as enjoyable or wanted. For example: wind rustling in trees, waves crashing on a beach, waterfalls and birds singing. Some human sounds may also be comforting, such as the burble of voices or the sound of children playing.

Tranquillity is a term used globally. It is defined as: ‘the quality or state of being tranquil, calmness, serenity, a disposition free from stress or emotion and a state of peace and quiet’. It can also be defined as: ‘a sense of calm or quietude’. It is often understood in terms of engagement with the natural environment (Jones, 2012).

Related concepts include soundscapes and quiet areas. Soundscape is complementary concept to environmental noise management, where sound is seen as a resource to be managed. Soundscapes focus on sounds of preference rather than sounds that cause discomfort. The metric is listener-centred rather than an objective-based energy metric...

Other factors considered include social and psychological effect modifiers. There is a growing body of literature on the psychological and psychosocial modifiers of annoyance and dissatisfaction due to noise (Guski, 1999; Hatfield et al., 2001; Kroesen et al., 2010; Nitschke et al., 2014; Schreckenberg et al., 2010).

Annoyance

Annoyance is defined as 'a feeling of displeasure associated with any agent or condition, known or believed by any individual or group to adversely affect them' (Berglund et al. 1999). Noise annoyance is a feeling of resentment, displeasure, discomfort, dissatisfaction or offence caused by noise interference. It is a well-established construct in the study of environmental noise and is considered an important end point for measuring the impact of noise in exposed populations.

...

In Australia annoyance is often considered an issue of amenity. But it forms an important part of the regulatory framework for noise.

It is not yet possible to predict noise annoyance on an individual level, given the many exogenous and endogenous factors that affect it. However, relationships between noise exposure and annoyance can be understood together with several effect-modifying factors. To assess noise-induced annoyance at the population level, a standardised questionnaire can be used. The percentage of respondents who report being highly annoyed can then be used as a prevalence indicator for annoyance in the population (WHO, 2011).

Several theoretical models, including those described above (Babisch, 2002; Miedema, 2007) consider annoyance on a causal pathway to health effects such as stress, cardiovascular effects and sleep disturbance.

...

Controlling vehicle noise and traffic can reduce noise by 1 to 5 dB(A).

Noise barriers can cut up to a 10 dB(A) although effectiveness depends on barrier height, length, material density and distance from noise source. However, barriers can only be fitted along no-access roadways and many urban roadways have road frontages from properties. Extra height in barriers can reduce noise further, although these are restricted by structural elements and aesthetics.

...

Legislated planning mechanisms are important at the **earliest stage of the development**, such as at the zoning, subdivision or initial development design stages. This helps manage the potential for land use conflict around noise before construction starts.

...

2.4.4 Industrial noise and other fixed noise sources

Control of industry noise affecting communities is the responsibility of planning and environment authorities in the states and territories. Local ordinances or **operation restrictions** may be needed if construction activities take place in an area with sensitive uses, such as schools or hospital zones, or outside standard construction hours. Reductions in industrial noise can be achieved by encouraging **quieter equipment or by zoning controls** to separate acoustically incompatible land uses, such as the contrast between residential and industrial zones. Noise emissions, like other environmental emissions, may also be licensed or regulated under relevant environmental legislation."

Source – The effects of Environmental Health, Australian Centre for Disease Control 2018

https://www.cdc.gov.au/system/files/2025-10/enhealth-guidance-the-health-effects-of-environmental-noise_0.pdf

The above contains good mitigation considerations which could be implemented by Planning authorities, local government and the Proponent.

The EIS as it stands could include more mitigating measures than it currently offers. I kindly ask that consideration be given to these kinds of initiatives, and envisage that the local community would be appreciative of changes in building design and noise and traffic reduction in the demolition and construction stage.

Point 5B Air Impacts

"Recent epidemiological research suggests that there is no threshold at which health effects do not occur. The health effects are many and include toxic effects by absorption into the blood, allergic or hypersensitivity, fibrosis, cancer increased respiratory symptoms and much more." Source - Fact Sheet on Particulate Matter, Department of Climate Change, Energy, the Environment and Water

<https://www.dcceew.gov.au/environment/protection/npi/substances/fact-sheets/particulate-matter-pm10-and-pm25>

The existing framework for Air monitoring and levels of acceptance relied upon in the EIS is not considered in my view satisfactory given the evidence of research proving the dangers of particulate matter and the close location of the Site to sensitive receivers in particular young children.

Serious consideration needs to be given to a new acceptance threshold, particularly given close proximity (from 16 metres) to young families. I refer to the below,

“This review **strengthens the evidence for a positive association** between exposure to pollutants – including elemental carbon (EC), benzene, nitrogen dioxide (NO₂), nitrogen oxides (NO_x), coarse (PM₁₀) and particulate matter ≤2.5 µm (PM_{2.5}), and sulfur dioxide (SO₂) – **and asthma development in children**. Previous studies have also highlighted the negative impact of air pollution on asthma onset and clinical outcomes in both adults and children.⁶ According to the 2024 GINA Report,⁴ up to 13% of global childhood asthma incidence could be attributable to traffic-related air pollution (TRAP), which primarily consists of particulate matter (PM) known to have harmful effects on the respiratory system.⁴ In contrast, no significant associations were found between specific air pollutants and asthma development in adults and the elderly. **Children are particularly vulnerable to air pollutants due to their underdeveloped respiratory and immune systems, higher ventilation rates, and reduced efficiency in filtering inhaled particles.**^{26, 37, 38} Therefore, **reducing exposure to pollutants during early life stages is crucial.**

Reducing exposure to outdoor pollutants is critical for improving asthma incidence and morbidity.”

Source - Influence of outdoor air pollutants on asthma, D. Espejo, V. Plaza, et al, Open Respiratory Archives, Vol 7 Issue 3, Jul to Sep 2025

(<https://www.sciencedirect.com/science/article/pii/S2659663625000529>)

Planning and regulatory authorities should consider placing reliable air monitoring at locations closer to the Proposed Site location, especially given that the LCW industrial facility has been earmarked by industry for further data centre development. Air monitoring should also be placed at prime sites like Lane Cove West Public School, and at some sites in the residential zones eg Wood Street, Banksia Close, Cullen Street and Penrose/Myee Crescent. Sites across the river like East Ryde would also be relevant.

Air quality at these locations should be monitored now, and baselines (also adjusted for existing data centre AirTrunk), be included in any air impact assessments.

As mentioned previously with Noise, cumulative and aggregate studies should be undertaken to represent the effect of the 5 proposed data centres.

Demolition and construction dust

I would argue that the dust related to these activities is not “nuisance dust” but can create very real and harmful effects with exposure. Destruction of cement buildings, driveways, hardstands, access roads, flyovers of the existing site will create harmful concrete dust. The estimated volume of these concrete structures should also be requested as a quick visit to the site shows they do not look insubstantial. The EIS appears to quote only a total of the cut to be taken away but there is no accounting for estimation of solid matter like concrete or rock. The suggestion of timing construction activities during the wetter months give little consolation as we are entering an El Nino period and it is unclear as to when that will begin and end. Will there be extractive filters fitted to the equipment in both demo/construction and ongoing operation of the generators? What other mitigating measures are proposed?

“Silica dust (crystalline silica) is found in some stone, rock, sand, gravel and clay. The most common form is quartz. Silica dust can also be found in the following products, bricks, tiles, **concrete**, some plastic material. When these materials are worked on, silica is released as a fine dust known as respirable crystalline silica or silica dust. Silica dust is harmful when inhaled into your lung. As it is 100 times smaller than a grain of sand, you can be breathing it in without knowing. Exposure to silica dust can lead to the development of lung cancer, silicosis, kidney disease and chronic obstructive pulmonary disease.” Source - Cancer Council, Information on Silica Dust

There are Safework regulations in place for workers in the workplace however there needs to be closer look at the dangers for residents and schoolchildren in the area, and users of Blackman Park.

Planning authorities should ensure that the appropriate level of risk will be applied to these activities and the mitigation measures are appropriate, before approving any Proposal.

Some suggested controls might be as per below;

Table 1 Summary of control measures for silica dust

ACTIVITY	CONTROL
Construction, planning and design	For example, by: - using other materials (e.g. autoclaved aerated concrete) in place of concrete - masonry planning buildings with pre-built recesses for plumbing, gas and electric wiring - ordering the right size materials - getting materials cut to size off-site.
Correct equipment	- Use fibre cement sheet shears instead of circular saws - Ensure the rock-drilling machines, have dust suppression features - Vehicles (i.e. tractors, excavators and bulldozers) should have a dust collection system - and an air-conditioned cab with a filtered air supply. Filters should be cleaned and maintained regularly.
Workshop ventilation	Have enclosures or hoods and local exhaust ventilation (LEV) to remove the dust at the point it's produced.
Abrasive blasting	WHS Regulations do not allow abrasives containing silica. Use metallic shot, slag products (ilmenite, garnet or staurolite) instead of sand. During blasting, containment methods such as blast-cleaning machines, cabinets and LEV should be used.
On-tool extraction	Use LEV that fits directly onto the hand-held machines. This is the most effective way of controlling dust.
Water suppression	To be used when LEV is not suitable. Water should be used through non-electric tools to wet dust down at the point of dust generation. For example, water should be provided to the blade when using saws; just wetting the material is not enough. Ensure equipment and work areas are cleaned regularly with water. Use water spray or rubber curtains around conveyor transfer points.
Respiratory protective equipment (RPE)	No RPE can prevent all silica dust from being breathed in and should be used in combination with other controls. RPE cannot protect you if it doesn't fit properly. Employers should have workers fit tested and trained in their use and maintenance. This is even more important if you have facial hair. It is important to choose the right RPE for the job; use the AS/NZS 1715:2009 standards or watch this HSE video for guidance on the selection and use of RPE.
Quit smoking	Smoking reduces the lung's ability to clear dust and increases the risk of lung cancer.
Personal protective equipment (PPE)	If possible, wear disposable clothing at work. Before you leave work, shower and change into clean clothes. Do not take your dusty clothes home to wash.
Administration	Display warning signs if tasks create silica dust. Rotate staff to limit the time they are exposed. Locate silica dust work outdoors, away from other workers. If not possible, enclose the area with floor-to-ceiling plastic sheeting.

Source - Cancer Council, Information on Silica Dust
<https://www.cancer.org.au/cancer-information/causes-and-prevention/workplace-cancer/silica-dust>

Diesel exhaust

The Proposal seeks to use Diesel generators for back-up power, which will require regular testing.

“Fine-particle emissions from diesel exhaust can be inhaled deep into the lungs and have been declared a carcinogen by the World Health Organization’s International Agency for Research on Cancer.” Source – Non road Diesel and marine emissions, EPA NSW

I do not agree with the use of Exemption under POEO Clean Air regulation S. 72 due to “emergency” use and less than 200 hrs/year.

Firstly, the power outages are unpredictable. Once the power is out, we have no estimates on which to base usage. The EIS purely dismisses it as unlikely to exceeding the 45 hours per year.

Even if the outages total less than 45 hours per year, the duration on one outage may be up to 4-6 or even 8 hours. It is an unknown factor, and there will be 49 generators operating with large volumes of NO₂ which are known carcinogens.

Secondly, more solar power could be utilised, notwithstanding Goodman’s argument that the site would not be optimised.

Thirdly, the generators need to undergo a regular testing regime. There is no proposed maintenance schedule, only that generators will be tested one at a time. This can equate up to 1960 minutes (or 32.7 hrs) in Q1-3, or in Q4. 3430mins (or 57 hrs). It has not been stated as to the timetable of the testing, if the generators are tested each one following each other, it will take one whole week of testing.

With sensitive receivers as young children in close proximity in neighboring houses, walking to school and back, playground time that could extend to a maximum daily amount of 7.5 hours (for a child attending OOSH and attending school), plus more if they also have Saturday sport, the maximum potential exposure to Diesel particulates could be 7.5hrs x 5 days, which equates to 37.5hrs per week. It will be more if they walk to school and back, or play sport at Blackman Park.

The same maximum exposure times also apply for the Construction dust.

There is too much risk to children and residents leaving this testing regime unregulated. Planning authorities need to consider the optimum regime that will minimise air pollution.

It is not satisfactory nor ethically responsible to claim exemption under S. 72 of the Act and be non-compliant of NO (Nitrogen Oxide) thresholds.

I would consider this a public health issue, and Planning authorities should use a more stringent test for Air Quality, and consider new acceptance thresholds due to the sensitive receivers at close proximity in the area.

Diesel Engine Exhaust

“DEE contains gases and soot, also called Particulate Matter. Other substances, including carcinogens, may stick to the soot. Due to their size, they can travel deep into lungs, and cause short and long term health issues, including cancer.” Source -

Cancer Council, Information on Diesel <https://www.cancer.org.au/cancer-information/causes-and-prevention/workplace-cancer/diesel>

Table 2 – Harmful Effect of Particulate Matter

What Kinds of Harmful Effects Can Particulate Matter Cause?

A number of adverse health impacts have been associated with exposure to both PM_{2.5} and PM₁₀. For PM_{2.5}, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, PM_{2.5} is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and world-wide based on the World Health Organization's [Global Burden of Disease Project](#).

Short-term exposures to PM₁₀ have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease (COPD), leading to hospitalization and emergency department visits.

Long-term (months to years) exposure to PM_{2.5} has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM₁₀ are less clear, although several studies suggest a link between long-term PM₁₀ exposure and respiratory mortality. The International Agency for Research on Cancer (IARC) published a [review](#) in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.

Diesel Particulate Matter and Health

The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface. Although particles the size of DPM can deposit throughout the lung, the largest fraction deposits in the deepest regions of the lungs where the lung is most susceptible to injury.

In 1998, CARB identified DPM as a [toxic air contaminant](#) based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. In 2012, additional studies on the cancer-causing potential of diesel exhaust published since CARB's determination led the International Agency for Research on Cancer (IARC, a division of the World Health Organization) to list diesel engine exhaust as "carcinogenic to humans". This determination is based primarily on evidence from occupational studies that show a link between exposure to DPM and lung cancer induction, as well as death from lung cancer. [Download the IARC report \(external site\)](#).

Because it is part of PM_{2.5}, DPM also contributes to the same non-cancer health effects as PM_{2.5} exposure. These effects include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Source - Submission in response to the Draft Protection of the Environment Operations (Clean Air) Regulation 2022

<https://envirojustice.org.au/wp-content/uploads/2023/11/EJA-Submission-on-draft-Clean-Air-Regulation-2022.pdf>

It is essential in the interest of public safety to look at new acceptance thresholds given the close proximity to schools and residential homes. Some of the mitigation measures that could have been proposed by the Proponent include “locating plant and equipment away from residential areas, locating them away from sensitive populations (e.g. schools, hospitals, childcare facilities) and/or use lowest emissions equipment near these areas, and avoid the onsite use of diesel or petrol powered generators by replacing them with electric or battery powered equipment where possible.”(Source – Non road Diesel and marine emissions, EPA NSW (<https://www.epa.nsw.gov.au/Your-environment/Air/non-road-diesel-marine-emissions>))

The site is not appropriate for the Proposal.

Point 5C Environmental Impacts

(A) With regards to Design and Landscaping

1. In EIS Figure 13 Landscape Masterplan, the placement of C New Outdoor Space for Staff and I New Secondary Outdoor terraced spaced for staff, are both considered to be inappropriate given C will be placed adjacent to the loading zone, and I could be positioned over South East boundary.

Could the generators then be moved further away from the sensitive receptors on the East. Placing I (terrace) on SE boundary would still give the staff views over the park (presuming that is the intention).

Similarly, the office building could be placed along the Eastern boundary for the same reason (noise mitigation).

2. Section 3.4 “90 existing trees on the site are to be removed” The Arborist report in Appendix MM does not comment on the impact of removal of trees to habitat.

The trees to be removed are large and significant and they likely form part of the wildlife corridor native fauna known to be in the area (Large eared pied bat, powerful owl and brush turkeys amongst others). The existence of narrow stretch of interconnected trees and shrubs coming from south Blackman Park and bushland, connecting through the narrow strip of trees on the Site and the Conservation Zone adjacent, through the trees situated at the end of the Mars Road cul-de-sac diagonally in front of the site, and towards the line of trees in the Recreation area between the Industrial Zone and behind residences on Avalon Ave, form an important gateway for these creatures to forage, roam, and rest, and to access the lower reaches of Stringybark Creek. These are the vital connections where the native fauna can safely travel away from the cars, people, domestic animals. From here, fauna can venture further to north Lane Cove and Lane Cove National Park.

There have been recent sightings of ringtail and brushtail possums, brush turkeys, and Powerful Owl sounds have been heard as recently as last week from Avalon Avenue, Cullen Street, Wood Street and Hallam Avenue residences.

The habitat immediately surrounding the Proposed site is known for the Large-Eared Pied Bat – Lane Cove Council

- The Large-Eared Pied Bat is listed as Endangered under NSW legislation - Biodiversity Conservation Act 2016 (the Act)
- The Powerful Owl is classed as Vulnerable in NSW Biodiversity Conservation Act 2016.
- The brush turkey and ringtail and brushtail possums are protected under the NSW Biodiversity Conservation Act 2016
- The red fox is a Priority Pest Animal in NSW (Biosecurity Act 2015, Biodiversity Conservation Act 2016)

There has also been a recent sighting of a red fox on Blackman Park oval in the same week, evidencing our lively fauna ecosystem. (Picture evidenced can be produced if needed).

On the Powerful Owl,

We already have narrow green corridors that exist bordering the Site area, and we “need to preserve and enhance the narrow fingers of bushland that penetrate into suburbia. They are important corridors for Powerful Owls and they have the highest chance of including both nesting and roosting habitat. Nesting rarely occurs in urban gardens but generally occurs in these narrow corridors within 50 m of the urban boundary.

The vegetated edges of bushland adjoining suburban areas are essential for Powerful Owl breeding, roosting and foraging. These interface areas are often undervalued as habitat for local fauna and compromised by edge effects from surrounding human disturbance and urban expansion. Suitable habitat does not begin or end on a property boundary but may extend across multi-tenured lands, whether national park, local government park, public or private bushland and needs to be managed cooperatively.”

Source – Protecting Powerful Owls in Urban areas, Powerful Owl Coalition, 2018
<https://www.step.org.au/images/STEPimages/PDFdownloads/POppweb.pdf>

The transfer of heat from the data centre to the surrounding environment is inevitable. Planning Authorities should be aware that there is scope for heat effects to impact upon the surrounding environment.

Documented studies have shown there are real consequences of heat transfer, one such being the urban heat island effect. The impact to the immediate surroundings and the greater area must be looked at closer.

Recommend an independent Ecologist Report on these impacts to be included and considered by Planning Authorities so that retention of foraging and nesting sites are retained.

Point 6 Feasibility

EIS 2.4 Feasible alternatives page 20

This is a subjective area and most likely informed by Goodman’s financial budgets, forecasts and return on assets goals. This does not represent a

balanced view of feasible alternatives that adequately represents community, environment, or local council views.

I kindly ask that Planning Authorities recognise there needs to be a more equitable analysis.

Examples of this follow from Table 7:-

(a) Option 1 Do Nothing.

Consequences of not carrying out the development is that 200 local jobs are retained however the commentary by Goodman is purely from their perspective. There is a need for a balanced assessment.

(b) Option 2 Alternative Location

Goodman could have commented after its statement that it may be more appropriate to site the data centre in another location and seek to work with Govt and State authorities to find a suitable location, given the location to sensitive receivers and possibility of community concern around health impacts.

(c) Option 3 Alternative Design

Goodman states "In summary, these (alternative) options were dismissed as they would not facilitate the delivery of the operational requirements of the data centre and would result in an unacceptable design outcome"

Have alternative design options been explored in consultation with environmental or ecological, biological/health experts? This should be considered necessary scope in any Feasibility assessments.

Planning Authorities need to consider whether the regulatory framework needs to be amended for a more equitable analysis as this appears to be framed from a "commercially feasibility for Goodman" perspective and not a "considered approach of alternatives" given that community and local council concerns were raised in initial Engagement activities as early as April 2025.

Point 7 The Visual Impact Assessment VIA– Appendix N

It was identified that “There are close, sensitive viewing locations near the site including Blackman Park, along the Lane Cove River and within the Lane Cove National Park. Views from these locations have the potential to be sustained views of the development.” Page 60. Yet no photos were provided.

“Potential views of the proposed development are likely to be possible from:

- The neighbouring dwelling at 10 Banksia Close Lane Cove.
- Approximately five (5) dwellings located along Wood Street that are elevated above the Lane Cove Tennis Club. The tennis courts create a break in the surrounding trees allowing for views west to the site.

The potential impacts are considered to be low.” Page 60

No photos have been provided to substantiate this conclusion.

“• Potentially heavily filtered views from dwellings on the western side of Wood Street located to the north of the tennis court. The potential impacts are considered to be low.” Page 60. No photos have been provided to substantiate this conclusion.

The VIA also fails to identify the entrance to Blackman Park as a key vantage point given that so many football, cricket, and other users use the entrance either by car, or by foot, and the vantage point from here should be taken from ground level or head height level, where people are actually walking in, see photo below.



Photo A – Entrance to Blackman Park from footpath, looking towards the Site

There are other key vantage points that might be of objective value. I have included 2 more below.



Photo B – from the middle of the 2 large fields on the synthetic turf Blackman Park. As players wait for their time on the oval, or break out before or after game or at halftime, sidelines are used for these off field times.



Photo C – When exiting the bushland path that comes down from Penrose Street as many locals access this path every day to enter the park

Note – A view of the Proposed site has not been provided in the EIS where we can view the entire width of the buildings, from Mars Road. Please provide.

Visuals should also be provided from Pittwater Road Hunters Hill and Melba Drive at East Ryde where Proponent advised visual impact would be assessed to be low. Page 60. The provision of these would assist in substantiating their conclusions.

Point 8 Discrepancies and Materiality to Risks

Discrepancies and arising concerns with regard to distance in the following report:-

a) **Geotechnical Assessment** - Appendix SS

This report in 2.1 incorrectly states “the closest residential uses to the site are 200m to the east on Wood Street... and 250 metres to the north...on Banksia Close.”

There is also no mention of the Lane Cove West Public School, which should be considered as part as there are approx. 600 children attending between the ages of 4.5 years to 13 years, as well as on-site OOSH facility extending hours to 7-9am, and 3.25pm – 6pm for those participating children.

Concern is raised that the Geo Assessment may have relied on outdated information as the sensitive receivers and their locations to the site are incorrect.

Section 7 Potential risks

Section 7.1.1. “It is likely that the following structures are under ground...intensive investigations may be required”

Given that the site is positioned on a steep slope, adjoining conservation and recreation zones with hundreds of sports players visiting during both cricket and soccer (incl. AFL) seasons, and the many walkers that frequent Blackman Park daily, further investigations must be undertaken to ascertain whether the project is still feasible, and also as to whether the design could be improved so as not to disturb underlying structures and create potential instability to the site and surrounding area, including riparian land and valuable ecosystems.

Section 9.3 Excavation Conditions

Concern (A)

“Any contractor should satisfy itself regarding excavatability, especially in the BEDROCK units. Sandstone exposures could be observed along the property boundary. See Photo 5.”

In Lane Cove National Park there are “250 metres thick Hawkesbury Sandstone of the Lane Cove Valley, which dates from the middle Triassic Period, estimated to be some 230 million years old.” <https://lanecovebushland.org.au/fiddens-wharf-track-lane-cove-national-park/> It would be reasonable to assume that any sandstone found on the Site or adjacent to the Site, would also be of similar age.

“The oldest unit in the study area is Hawkesbury Sandstone; consisting almost entirely of medium to coarse grained quartz sandstone with minor shale and laminate lenses. Overlying this unit across about 30% of the study area is

Wianamatta Group (Ashfield Shale). The Mittagong Formation, which consists of both shale and sandstone material, encroaches on a small proportion of the study area along the eastern boundary. Outcropping of sandstone is common on the valley slopes where the overlying shale has eroded during the development of the streambed.”

[https://ecouncil.lanecove.nsw.gov.au/TRIM/documents_TE/1002850536/TRIM_Native%20Vegetation%20of%20the%20Lane%20Cove%20Council%20LGA%20Report%20Sept%202010%20%20final\)_649242.PDF](https://ecouncil.lanecove.nsw.gov.au/TRIM/documents_TE/1002850536/TRIM_Native%20Vegetation%20of%20the%20Lane%20Cove%20Council%20LGA%20Report%20Sept%202010%20%20final)_649242.PDF)

In the feasibility assessment, was it considered that some of the sandstone should be preserved given the likely historical age of the embedded sandstone? I note Lane Cove Council’s concerns in its Submission to the Proposal with regards to the deep excavation proposed and that the depth proposed is unusual for developments in the LCW industrial estate.

“Most data centre designs require level platforms. Uneven terrain must be carefully managed through balanced cut and fill strategies. Minimising spoil removal, retaining walls, and road gradients is crucial, especially for HGV circulation and cost efficiency” - Data Centre Masterplan Design Principles and Best Practices 2 May 2025 (<https://www.mca.ie/insights/data-centre-masterplan-design-principles-and-best-practices/>) (HGV - Heavy Goods Vehicles term as readily used in the industry.)

Concern (B)

In the same section of the Report, it states:-

“Heavy rock breaking equipment will generate **vibrations that may impact on neighbouring structures**.... The contractor should recognise that there is a potential for damage to adjacent buildings or infrastructure (if any) and consider this in its planning.”

It is considered to appropriate to verify with the Report authors if the content and recommendations of the report would alter, given the knowledge of accurate distances of the nearest sensitive receivers and the inaccurate distances quoted in their report, to clarify any potential impacts on neighbouring structures, including, and not limited to homes, garages, recreational facilities such as the Skate Park, and infrastructure.

Any amended report should be provided to the Planning Authorities for consideration.

b) **BCA Design Compliance report** – Appendix L

The report states inaccurate distances: -

“The closest residential uses to the site are 200m to the east of the site on Wood Street, Lane Cove West and 250m to the north of the site on Banksia Close.”

The site is located within 16-20metres of the nearest residential home (boundary to boundary) at 10 Banksia Close. The site borders Conservation Zone to the East. The site is located approx. 50 metres of the nearest home on Wood Street. The site is

located approx. 160 metres from a Lane Cove West Public school, a primary school for young children.

Have the Report authors taken these into account? The Report needs to be reviewed by the Authors and any changes made and new Report issued.

Point 9 Scalability

The EIS mentions that the Proposed design will ensure future scalability. It should be made public (for fair assessment) what the future goals and forecast capacity (MV) of the data centre are, particularly given the recent upscaling in capacity for Next DC in Artarmon and the AirTrunk facilities in Lane Cove West.

Point 10 The Objects of the Planning Instrument

I refer to the Lane Cove Local Environmental Plan 2009 (2010 EPI 49), the Act. and in particular the Land Use Table for Zone E4.

Objective 3 To minimise any adverse effect on industry on other land uses.

The proposal seeks to re-develop the Site and encompasses deep excavation and estimated cut of 67,410m³

It will significantly change the nature of the site, leaving it permanently affected. This will affect future use of the land for other purposes. The proposal has also not stated the estimated life of the Site structures and whether due to future anticipated use of renewables, the operations may move to a larger site as you would expect increased capacity to be required as time goes by. Being situated so close to homes, the use of renewables may be limited due to technologies available and impacts to the sensitive receivers, eg wind farm or hydraulic energy systems may face constraints in this location, and biofuels have yet to prove themselves as clean and reliable. The Proposal fails to meet this objective.

Objective 7 To ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties. The Proposal has not really considered the viewpoint from the south and the east in its landscape design. The removal of mature or tall and significantly wide (10 – 25m diameter) trees from these boundaries will detrimentally affect landscape and amenity from these orientations. I acknowledge that new plantings have been included in the design, however these will take years to reach the same heights and canopy cover as currently exist. Particularly for the residential homes along Wood St which border the Conservation Zone, these trees should remain and further setback for building from the east boundary of the site should be considered necessary.

The current Proposal fails to meet this objective.

Objective 8 To recognise the proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses.

The Proposal does not seem to recognise the proximity of this zone to the adjoining conservation and residential areas, nor does it appear to mitigate potential conflict. Throughout the EIS, the distances have quoted as inaccurate. I am aware that Goodman have declined to attend a recent public forum on Data Centres in Lane Cove held or taken the initiative to make themselves available for forums or public discussions on the Proposal.

The Proposal does not appear to meet this objective.

Point 11 - Lane Cove Community Nursery: Value

Environmental and community concerns

Value to Community

As mentioned earlier the community Nursery is involved in carrying out vital work and educational activities which maintains and restores our local government area. It operates in the Conservation zone bordering the east of the Site.

I am deeply concerned about the current proposed set backs for the buildings in the Proposal, particularly on this eastern boundary and do not feel it is sufficient, despite being described as having "significant setback or landscape buffer" in the SEARS letter dated March 2026. I feel that there has been an error of misunderstanding and the misinterpretation/misclassification of trees as buffer, when they are core to an existing green infrastructure (natural) which serves to protect our native fauna and provide our nursery with a microclimate that they have worked hard to understand and create the ideal conditions under which the seedlings will flourish.

See attached Exhibits A, B, C, D & E showing the nursery and its environment 2nd May 2026.

It is evident that the area is flourishing and provides a vital ecosystem for fauna and flora which connects to the line of trees south along the Site to the river and greater bushland. As previously mentioned, this area also connects to a narrow wildlife corridor behind Avalon Ave, where wildlife can forage or travel through to lower Stringybark Creek which affords them access and protection from predators, to a larger and another diverse hunting/foraging grounds and habitat. The existing trees along the eastern boundary of the Site should all be retained and the 8 earmarked for removal to be verified by ecologist that they do not form important habitat for fauna.

There are habit and foraging implications of the existing canopy trees being removed, and also of construction/demolition sediment running down into the concrete pipe pictured in Exhibit E which appears to go to stormwater drains. Lane Cove cannot risk pollution into our waterways which are already struggling from pollution over the last 10 years. Strict controls will be needed for the Proponent to avoid sediment from demolition and construction running into this drain.

In my view, a building setback from the eastern boundary of at least 25m would be more sufficient, also taking into account tree and root protection zones, given the tall existing canopies. This would also ensure there is adequate setback from the wetland style environment surrounding the creek, which is riparian land, in order to preserve this critical ecosystem.

It would also enable the Proponent to adhere to a rigorous sediment control plan. See Exhibits A, B, C, D for the ecosystem on the Nursery land C2.

I would recommend that the expert advice of ecologists be sought and necessary for the progression of reaching an optimal balance of commercial objectives and ecological & environmental considerations, (eg transfer of heat being one, continuous mechanical noise 24/7 etc) considering our sensitive receivers fauna, flora and humans.

There are also real impacts of noise and air pollution from the project, both initial and ongoing for the workers here. Many are volunteers, and come for the community spirit and to share a common goal which is altruistic. The work that is done here is in so incredibly important, and the health of the nursery and its workers, must be preserved in every way possible.

The utmost level of care will need to be applied when mitigating any pollution risk.

12 More Social Impact Assessment concerns

The initial findings of the Social Impact and engagement studies revealed that locals would be concerned about noise, and yet it is unclear if the proposed design reflects this due to the scale and orientation of the machinery and generators.

Was there consideration of ways to mitigate noise by placing mechanical equipment farther away from the East and North boundaries? Proposed design instead places the mechanical plant to the East and South, and North.

Whilst undertaking surveys, desk reviews, zoom interviews, I feel more impactful insight could have been achieved by a Field visit. A valuable opportunity was missed to observe locals going about their life.

The **identity and culture** of Lane Cove locals could have been better understood by interviewing, not surveying, locals and gathering intelligence particularly by basing survey staff to observe at Blackman Park and the surrounding locale around the Site. Many children walk to and from school, accompanied by parents and younger siblings. Much of the neighbourhood is heavily involved in local sports, recreation clubs, community initiatives. Most afternoons you will see the cars snake their way down to Blackman Park for the sports their children love to play. Many kids will also walk there. Lane Cove loves their café lifestyle, are active and love going for walks, particularly with our dogs!, and are surrounded by a multitude of green spaces and nature corridors to explore.

Lane Cove has a strong sense of community and a strong connection with nature and feel very strongly about any loss of ability to enjoy our natural surroundings as they are.

The EIS, 5.4 page 53 states

“Goodman will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project, its potential impacts, and the approval process; and
- Enabling the community to seek clarification about the project through the two-way communication channels.”

In the time between lodging the EIS and today 4 May 2026, Goodman were invited to a public forum hosted by Abigail Boyd (MP) and Lane Cove Councillor Rochelle Flood, however declined to attend.

No initiative has been made from their side to hold meetings to discuss any concerns with the general community.

Point 13 Objectives of the Zone E4

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This does not satisfy the Objectives of the Zone under Lane Cove Local Environmental Plan 2009 (2010 EPI 49) (Part 2 Land Use Table for E4) for the following;

- To encourage employment opportunities
Loss of diversity from existing businesses on site and local employment jobs. The Proposal will see the loss of the existing businesses on site and 200-210 jobs disappearing from the LGA. Whilst Project construction will see 200 jobs, when the site is in operation only 26 full time jobs will result. The construction jobs are temporary in nature.
- To ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties.
There has been insufficient evidence and insufficient Visual Impact Assessment to substantiate this has been met.
- To recognise the close proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses.
The Proposal does not contain a large enough transition between the Conservation Zone and the Site, having only proposed 6.3-10m (variable) setback from building on the East boundary.

Point 14 Climate Change and Sustainability concerns

Given the warming atmosphere due to Climate change, it is disappointing to see there is no proposed use of Recycled Water, or greater utilisation of Solar Panels, use of cleaner fuel (although I understand there are challenges with the current Biofuel offering), reduced use of Diesel generators or a better proposed combination of Electricity, Battery, Solar Power, in order to limit the dependence on Diesel Generators for power outs.

In this climate, and with the ongoing global fuel crisis, we need to start looking beyond metropolitan cities, as future needs will require use of renewable energy sources in the near future, eg solar, wind, and the use of recycled not drinking water.

This is where a co-ordinated State and Federal approach is urgently needed in order to plan Renewable Energy Zones (REZ) in regional areas where anticipated future infrastructure needs can be built.

No doubt this involves intensive capital investment, it would then be appropriate for the data centre industry together with govt, and utility companies to enter into joint venture agreements.

This will align objectives, governance, and future strategies and goals.

By doing this, the government bodies would ensure that National expectations of data centres would be met, and also meet NSW guidelines.

By addressing my concerns, I respectfully ask that Planning Authorities recognise that there are material gaps in the existing regulatory framework primarily due to the evolving nature of data centres in the last 3 years and the positioning of the site close to residential, recreation and conservation zones.

Given the close positioning, and public health concerns, it is crucial for health experts to provide guidance around tolerable Air and Noise pollution levels, particularly relevant as we already have many data centres operating at close proximity to families.

I ask that this Proposal be directed to the Independent Planning Commission or be paused until the results and recommendations of the Parliamentary Inquiry have been established so a comprehensive planning approach is applied given the rapidly evolving nature of data centres.

Thank you

Attachments - Exhibits A,B,C,D,E