

Submission – Objection to Project Mars Data Centre

Submission to NSW Planning – Re: State Significant Development SSD-82052708

Author: Resident of Henley Street, Lane Cove West

Submission - Objection to Project Mars Data Centre

12 Mars Road, Lane Cove West

I am a long-term resident of Henley Street, Lane Cove West and where I have lived with my family of 5 for the past 14 years. I strongly object to the proposed Project Mars Data Centre at 12 Mars Road.

This submission is to **strongly object** to the proposal referred to as State Significant Development SSD-82052708 for the construction and 24-hour operation of a data centre, with overall power consumption of approximately 90MW.

My comments are informed by Appendix JJ – The Social Impact Assessment. I have significant concerns around the independence and accuracy of this report and I believe it is not fit for purpose and may be misleading in several respects. In that report it asks the question “would a reasonable person judge the SIA report to be impartial, transparent and suitably rigorous, given the nature of the project?”. The answer is NO and on that basis alone the proposal must be rejected completely.

Outside of the problems with the SIA, my objection is based on the significant negative impact of the proposed data centre on the surrounding residents and community. Grounds for objection include:

- The Social Impact Assessment is not credible. It is not independent and many of its conclusions or assessments are wrong.
- Significant loss of employment in the area and the change in the character of the business park.
- The poor state of the planning proposal documentation which includes multiple errors and conflicting statements as to what is actually being proposed.
- The lack of consultation with the local community, and where consultation was completed that it was on the incorrect or incomplete information.
- Lack of any tangible benefit to local residents in the face of significant admitted negative impact and loss of amenity
- the impact on resident housing (as close as 50m from houses),
- its close location and known and unknown impacts on the Lane Cove West Primary School (160m away),
- the closeness to significant parklands and public open space and impact on the quiet enjoyment of these areas

While there are many reasons to reject the proposal my notes below focus on the first 3 points.

1. The SIA is not Credible

The SIA is not credible. In the executive summary it states that “*An SIA is an independent and objective study which identifies and analyses the potential positive and negative social impacts associated with a proposed development. It involves a detailed study to scope potential positive and negative social impacts, . . .*”

No scoping done for SIA by Urbis

In section 1.6. SIA GUIDELINE REVIEW QUESTIONS AND RESPONSES, following the question on page 14 which asks the authors to attest to certain things. In answer to the question “When undertaken as a part of SIA scoping and initial assessment, has the plan for the SIA been detailed?” - the answer given is “SIA Scoping not undertaken”.

If this is the case – who did the scoping? Isn’t it logical that the “independent report” would undertake scoping of the report or is this dictated by Goodman? If Goodman dictate what should be covered how is this independent and how is it in line with the NSW Planning Department Social Impact Assessment Guideline?

The Executive Summary Table Shows Only Positives – How?

Despite the known impact of the construction of the data centre and the significant ongoing disruption to the community. The Executive Summary lists only “Negligible” or “Low Positive” impacts on each of the 13 impacts they identify. How is this objective? See a summary of this reproduced in the table below.

	Impact description	Mitigated assessment
1	Potential impact on environmental values	Negligible to low positive
2	Potential impact on Blackman Park amenity	Negligible
3	Potential traffic and parking impacts	Construction: Negligible; Operation: Low positive
4	Potential pedestrian access impacts	Negligible
5	Potential impact on Aboriginal culture and heritage	Low positive
6	Noise and vibration impact during construction and operation	Construction: Medium negative; Operation: Negligible
7	Potential air quality impacts during construction and operation	Construction: Negligible; Operation: Negligible
8	Enhanced access to worker amenities and services for future workers	Medium positive
9	Potential visual impact	Negligible to low positive
10	Increased local and regional employment opportunities during construction and operation	Construction: High positive; Operation: Low positive
11	Potential impact upon existing site tenants	Negligible
12	Opportunities to contribute to decision-making systems	Low positive
	- Potential risks and hazards associated with the on-site fuel and lithium battery storage.	
	- Safety and security of the community due to the risk of attacks.	
	- Cumulative contribution to the digital economy	
13	- Contribution to urban heat	

- How is a development that is going to remove 90 trees and draw 90MW of power and use 510million litres of water a year as well as have 49 generators and store 1 million litres of diesel fuel onsite going to have a “low Positive” impact on environmental values? Is this credible?
- How will the visual impact be “Low Positive”. This is not credible!!
- How given the report states that over 200 people are currently employed on the site and then on completion during operation this will be 26 people, result in “Low Positive” impact on ‘increased local and regional employment opportunities during operation’? - Not Credible!

Below is the last paragraph of the assessment of the impact assessment on

employment. Does this make sense to anyone?

Considering the low proportion of employment during the Proposal's operation in comparison to current use, balanced with the different profile of workforce and the increased likelihood of the Proposal activating other uses, the unmitigated impact during operation is assessed as **low positive**, due to the **likely** likelihood and minimal magnitude.

- How is the potential impact upon existing site tenants “negligible”?

The 3rd question in the list of questions in the NSW SIA Guideline list is the question “Would a reasonable person judge the SIA report to be impartial, transparent and suitably rigorous, given the nature of the project?”. The authors have answered “Yes” to this question.
See below the excerpt from the SIA.

I ask the Department of Planning: **If you take a reasonable look at the SIA report do you believe it is “impartial, transparent and suitably rigorous”?** If not, you should not approve this proposal.

Table 2 Guideline review questions and responses

SIA Review questions	Addressed by report (yes/no), relevant section
Does the lead author meet the qualification and experience requirements?	Yes – Section 1.5.2
Has the lead author provided a signed declaration?	Yes – Section 1.5.2
Would a reasonable person judge the SIA report to be impartial, transparent and suitably rigorous, given the nature of the project?	Yes
Does the SIA identify and address the cumulative impacts of the project?	Yes

Woeful Community Engagement Efforts in the SIA Field Study

The SIA identifies 6 Methods of community Engagement and consultation in its report. It appears to engage with a total of 106 people who may or may not be residents of the area.

Engagement Activity	Participant numbers
Early noise study door knock	3 residents included
Letterbox drop	1,144 drops – 57 responses to survey in newsletter, unknown if others read it
Consultation at Lane Cove Plaza (2km away from affected residents) 2 x 2hr sessions 1 week apart	45 people spoken to. No comment on if they were Lane Cove West residents
Key stakeholder briefings (as required)	0 – no requests made
Invitation for interview from LCWPS	0 – no contact made

Interview with Lane Cove Football Club	1
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Even in the engagement all the responses are negative but have been ignored to result in a positive outcome on all impacts in the SIA

The survey was answered by just 57 people. But even those answers were hugely negative but appear to have been ignored. For example:

Question Four: In what ways do you anticipate the proposed development would impact the community?

There were 49 responses to this question.

- 42 respondents (or 85.7%) anticipated that the proposed development would negatively impact the community.

Question Six: Please describe the most significant positive impacts anticipated from the proposed development.

There were 39 responses to this question. Of these:

- 30 respondents (or 76.9%) stated there would be no positive impact resulting from the proposed development
- 4 respondents (or 10.3%) felt that they were unsure or did not have enough information to comment.
- 4 respondents (or 10.3%) believed the proposal would financially benefit the developer.

Question Seven: How could these positive impacts be further enhanced?

- There were 39 responses to this question. Of these:
- 24 respondents (or 61.5%) believed there were no positive impacts.
- 5 respondents (or 12.8%) believed the development should be relocated.
- Other responses included reducing the footprint of the proposal, reducing the environmental impacts, incorporating associated tech businesses as part of the development, providing more information to the community, providing more on-site employment opportunities, managing traffic during construction, and including more green space as part of the development.

Question Eight: Please describe the most significant negative impacts anticipated from the proposed development.

There were 46 responses to this question. Key themes identified were:

- Noise impacts: 28 respondents (or 60.9%) identified noise generated by the proposal as an anticipated negative impact.
- Resource use: 10 respondents (or 21.7%) identified the considerable energy and water necessary to power data centres and raised concerns as to how this would affect local residents' access to resources.
- Traffic impacts: 8 respondents (or 17.4%) identified traffic generated by the proposal as a possible negative impact. Several respondents noted that traffic is an existing issue in the local area and were concerned that the proposal would exacerbate this.
- Construction impacts: 8 respondents (or 17.4%) believed that construction of the proposal would result in noise, air quality and traffic impacts.
- Environmental impacts: 8 respondents (or 17.4%) believed that there would be detrimental impacts to the environment resulting from the proposal. Respondents were also concerned about the impacts of the proposal on local wildlife.
- Air quality impacts: 6 respondents (or 13.0%) were concerned about possible impacts to air quality resulting from the proposal. Several respondents noted that they or a family member experienced a respiratory illness, which would put them at risk.

Question Nine: How could these negative impacts be avoided or reduced?

There were 48 responses to this question. Key themes identified included:

- 22 respondents (or 45.8%) suggested moving the proposal to a different location.
- 10 respondents (or 20.8%) said the proposal should not be approved or built.

Questions Ten: Do you have any additional comments about the proposed development?

There were 36 responses to this question.

- 17 respondents (or 47.2%) stated that they did not think the data centre should be approved or developed.
- 7 respondents (or 19.4%) wanted more details on the proposal and data centres generally. Respondents were particularly concerned about the noise generated by data centres, the traffic and parking impact, and possible health impacts of living near a data centre.

Despite the overwhelming negative response to the development proposal the SIA identifies all impacts as either negligible or low positive!

I ask the NSW Department of Planning: Would a reasonable person judge the SIA report to be impartial, transparent and suitably rigorous, given the nature of the project?”.

2. Change of Character of The Business Park and Loss of Local Employment

The SIA describes the Business Park in glowing terms for its connectivity of workers to their homes and the Greater Sydney Region Plan for a 30 minute city “where residents can easily access jobs, education and services” but the very proposal is ruining this connectivity.

The statement from the SIA is below:

The Business Park is connected by public transport, with bus routes 258 and 285 providing direct links to Wynyard Station and Chatswood Station, which offer train and metro services. Additionally, bicycle lanes connect the Business Park to the Lane Cove West residential area via Mars Road through Banksia Close.

The Business Park is strategically positioned to align with the Greater Sydney Region Plan (GSRP), which envisions a metropolis of three cities: the Western Parkland City, the Central River City, and the Eastern Harbour City. Situated within the Eastern Economic Corridor, part of the Eastern Harbour City, the Business Park benefits from a high concentration of jobs and road and public transport connectivity. This facilitates interaction between businesses and people.

The Proposal's location within the Business Park ensures connectivity for workers to key economic centres, including the Sydney CBD, North Sydney, and Macquarie Park. This further supports the GSRP's vision of a 30-minute city, where residents can easily access jobs, education, and services.

The SIA states that there are currently 22 businesses operating at the business park with over 200 jobs on that site. After construction the jobs will be reduced to 26 jobs. While the jobs are not ‘lost’ they can be moved but it moves them away from residents.

I live on Henley Street approximately 300 metres from the Lane Cove West Business Park. One of my sons is currently undertaking an apprenticeship in metal manufacturing. His regular apprenticeship is in St Mary's. He drives 50km each way to work each day. On weekends he works in the industrial park. He hopes to work their full time and the proximity to home would be life changing. Reducing industrial employment opportunities for him is a significant negative outcome of this proposal.

I note the SIA comments that the population is set to grow in Lane Cove LGA and also has employment in the business park growing although, I assume they did not factor in data centres reducing employment opportunities.

3. Documentation is full of conflicting numbers, errors and ‘suck it and see’ proposals that are not worthy of approval, at least until corrected and specifically articulated.

What exactly are NSW planning supposed to approve?:

The documentation is of a very poor standard and riddled with errors and contradictions.

For example:

EXAMPLE CONTRADICTION 1 – Proposed Height

Appendix JJ: The Social Impact Assessment states in its introduction

1. INTRODUCTION

Goodman Property Services (Aust) Pty Ltd (the Proponent) engaged Urbis Ltd (Urbis) to prepare a Social Impact Assessment (SIA) for 12 Mars Rd, Lane Cove West (the site). The SIA will inform a State Significant Development Application (SSDA) to develop a data centre on the site (the Proposal).

The Proposal will include an approximately 18-metre-tall building with two data hall floors, a roof plant, two levels of associated office space, and car parking. It will operate 24/7. The site area is 33,559 m² and is located in an industrial and commercial district within Lane Cove West.

The State Significant Development Application seeks consent for:

- Site preparation works including demolition, bulk excavation and removal of existing structures on the

Is the Social Impact based on this 18m tall building (the permitted height under the Lane Cove LEP 2009) or is it based on the 28.3m tall building stated in the application. Note this is over 50% higher than currently permitted. A third height of 33m is detailed in the Air Quality Impact Assessment (Appendix T, Table 2), this is more than 80% higher than the current permitted height.

In the EIS – the potential visual impact of the finished development is listed as “Low Negative”. Is this based on 18m or 33m height?

Which height has been discussed in consultation? Which one is actually proposed? How are residents, who may lack the expertise or time to review all these documents, supposed to work out what is being proposed and its impact? How will NSW Planning decide? Will they reopen consultation?

EXAMPLE CONTRADICTION 2: How Much Power is being used?

The maximum power consumption of the centre is variously referred to as 90MW or 81MW

CONTRADICTION 3 – Noise Monitoring was Done while Roadworks were happening

The Noise Baseline Is Unreliable. The baseline monitoring from residences in Banksia Close and Wood Street was done while significant roadworks were being undertaken by Interflow on Banksia Close and Hallam Avenue. The EIS does not mention this at all. There is significant evidence that the baseline noise monitor levels will therefore overstate the ambient noise in the area. The baseline monitoring is not credible.

In addition, the NVIA describes Banksia Close as being to the north of the site. It is to the east. This error may impact assessment of wind dispersion modelling for generator emission plumes. Does this have an impact?

CONTRADICTION 4: How Long will it take and when will it start construction Why the contradictions in the documentation?

The main EIS (Section 3.9) states construction will take 24 months, commencing Q1 2026. The Infrastructure Report (Appendix KK, Section 2.7) states construction will take 34 months, commencing Q1 2027, with operation commencing Q4 2029. The main EIS also states a commencement date — Q1 2026 — that had already passed. You would expect a global listed property company like Goodman would know how long construction will take. Why the contradictions? Again what are NSW Planning approving or is vagueness like this normal?

Example of a Suck it and See Proposal

The NVIA relies on indicative plant specifications with finalized mechanical design. The facility's actual noise performance will depend on plant selected and operated by a tenant not yet identified. What exactly will be approved by NSW Planning? Will there be specific, binding, pre-operational independent verification that noise and vibration requirements are being met? If the centre does not meet the actual operational noise at NCA02 — 25 metres from the facility — will it be shut down. What enforcement mechanisms are there? What compensation is available to residents in that circumstance?

EXAMPLE ERROR – The report is obviously copied from another assignment!!

In the Noise and Vibration Impact Statement the opening paragraph states that the “The site is located on Country of the Gadigal people within the local government area of Bayside Council.”. See below for excerpt. It is obviously not on Gadigal land and is clearly part of Lane Cove Council. Is this report reliable?

1.1 The Site

The proposal is located on land known as 12 Mars Road, Lane Cove West, legally described as Lot 22 DP732062, and is zoned E4 General Industrial. The site is located on Country of the Gadigal people within the local government area of Bayside Council.

The site is located in the Lane Cove West Business Park which is a key economic and employment precinct in the Lane Cove Local Government Area (LGA). The site comprises one individual allotment totalling 33,559 m². It is currently occupied by four warehouse buildings with ancillary office spaces.

Surrounding land uses in the immediate vicinity of the site include:

How can a NSW Planning make a decision on a proposal so full of errors and contradictions and vague promises.

Conclusion:

The data centre proposal is very poorly put together and the Social Impact Assessment is clearly written to minimize all the impacts of building a data center within 50m of houses. The impact on the surrounding community, the local environment and the loss of employment in Lane Cove is too high a price to pay and the benefits do not accrue to local residents and if there are benefits, they are no greater than they would be if you built it further away from housing and community infrastructure.

Not all data centres are bad but this one is not appropriate.