

Submission in opposition
Project Mars Data Centre – 12 Mars Road, Lane Cove West
Application No. SSD-82052708

1. Executive Summary

I object to and oppose the proposed Project Mars data centre in Lane Cove West as it will result in unacceptable and ongoing impacts on residential amenity, and is inappropriately located given its scale, intensity and operational requirements.

In short, the EIS and its accompanying reports do not establish that the project has significant merit, other than for Goodman's bottom line, which would override the substantial detrimental impacts to the local community and recreational space. Accordingly, this proposal should **not** be approved.

I think it is important to state at the outset that while I acknowledge the need for digital infrastructure, this proposal fails to demonstrate that such a facility can operate compatibly where it is immediately adjacent to and on the doorstep of a residential community and recreational space in a constrained urban environment.

My reasons for objecting to the proposed development are:

- inappropriate location
- visual bulk and form
- unacceptable noise
- unacceptable air quality
- security, risk and safety concerns
- energy consumption
- water consumption
- heat generation
- property value and amenity
- cumulative impacts, and
- inadequate social benefits, including meagre job creation.

My partner and I live in Cullen Street in the low rise residential community of Lane Cove West, immediately adjacent to the proposed development. We have lived here for 13 years. We have young children who attend the local primary school, Lane Cove West Public School, which is only 160m from the proposed development. I interact with the proposed development site on a daily basis, catching the bus from the front of the proposed development on Mars Road. This location is my family's home, our safe place, and our beloved community.

The proposed development benefits Goodman and hyperscalers

Our local community environment should not be dictated by the desire to attract investment from US 'hyperscalers' in locations to ensure minimum 'latency' (ie, how quickly does it take for my app/website to load or for ChatGPT to answer my question). Goodman makes clear that this proposed development is for hyperscalers (p9 EIS) but disingenuously suggests that it will support 'local' businesses. The proposed development supports hyperscalers and their customers most, if not all, of whom will not be 'local' (ie, Lane Cove and surrounding) small businesses.

The EIS also asserts that the proposed data centre will provide Australian companies and organisations with the opportunity to store their data locally and thereby minimise cybersecurity risks (p21). This is also a false premise to seek to establish a 'social licence' to operate, when the data centre is designed for international hyperscalers. In any event, cybersecurity risk depends on how systems are secured, not where they sit.

General observations on the rushed and insincere EIS exhibition process

The EIS is extremely voluminous and complex.

Significantly, the EIS was cynically exhibited by Goodman over a period of peak distraction comprising Easter, school holidays, and the ANZAC day long weekend, hoping that distracted people or those on holidays would miss the opportunity to make submissions. Goodman would not have deployed such a tactic if it did not have serious concerns about the merits and veracity of its proposal, or whether it was socially viable or in line with good planning and community expectations.

Interested parties, including residents and volunteer unincorporated associations, have had only 5 weeks to respond to the EIS, on top of their day jobs, raising children, school holidays etc. Upon request, the Department of Planning saw fit to grant a paltry 7 day extension of time for submissions. For Goodman and Urbis, this is their day job, and they have still undoubtedly taken around 18 months to prepare the EIS. Us mere mortals have had to attempt to wade through complex assertion, data and planning instruments in a short timeframe around the 'business as usual' of our lives. This is patently an uneven playing field, and tantamount to a denial of procedural fairness. I have not been able to develop some of my objections in a detailed manner due to time constraints.

2. Inappropriate location

The proposed location on the very edge of a 'business park' - euphemistically called an 'industrial area' by Goodman/Urbis due to its industrial zoning, although its long term use has been a business park with offices, gym, children's gymnastics centre, childcare centre, cafes, and with some light industrial use.

Even Goodman's own signs in the business park refer to the area as a 'business park': see au.goodman.com/en/our-properties/properties-for-lease/transtech-business-park.

As does Google Maps and the RTA's street signage at entrance to the business park on Sam Johnson Way which says "Lane Cove West Business Park". This is an accurate description of the character of the business park.

Significantly, the business park is located within **mere metres** of sensitive receivers including:

- low rise residential homes;
- a primary school (Lane Cove West Public School);
- vast recreational areas (Blackman Park, Lane Cove Scout Hall, Lane Cove West tennis courts, Lane Cove West skate park, Lane Cove West dog park); and
- Lane Cove National Park.

This is very different to the data centre cluster at say Artarmon Industrial Area which area houses huge waste treatment facilities and multiple other large scale industrial operations.

A critical deficiency in the EIS is the lack of convincing justification for this location (other than the fact that Goodman owns the site and wishes to develop it) rather than an appropriate location with established buffers from sensitive receivers.

It is imperative that the relevant members of the approving authority undertake a site visit to appreciate just how close the proposed development is to local residences, Blackman Park and Lane Cove West Public School. The EIS states that the east of the site is bushland reserve with residential land located further to the east (p16 EIS). These residences are, in fact, about 40m, from the site boundary. The asserted 'bushland reserve' and 'significant landscape setback' between the site and the residences is little more than an oversized strip of trees.

The location is wholly unsuitable for a proposal of this size and scale. Giant data centres belong in 'true' industrial areas, not business parks next to low rise residential homes, a school, a childcare centre, a vast recreational area, a national park and a significant waterway.

The EIS says that the proposed development "responds to the site's context and positively contributes to the locality" (p5). The EIS does not respond to, but downplays, the site's context (pesky residences etc) to the extent that that context is unhelpful to Goodman's application. This objection, in combination with the many others from concerned sensitive receivers, should dissuade the approving authority of the alleged "positive contribution" of the proposed development to the locality.

Sure, Goodman will 'take these issues seriously' and introduce mitigations, but why not just use an appropriate site to start with? Just because Goodman happens to already own that land and wants to ride the data centre boom to generate revenue, **is the ultimate tail wagging the dog.**

There is insufficient justification for this location within the Lane Cove West business park, other than the fact that this is an existing Goodman site and Goodman seeks to maximise its return from its landholding on the back of the 'data centre' boom. Goodman's commercial interest in maximizing value to it does not equate with this being an appropriate site for a proposed data centre development.

Lane Cove West encompasses Blackman Park and parts of the Lane Cove National Park. It is a naturally leafy and green enclave. The proposed development requires the removal of a 41% of the trees on site (90 trees).

Goodman asserts that the proposed site is an "underused industrial site" (p7) and the buildings do not "meet the requirements of the market". This is patently incorrect as the buildings have been continuously leased, including a café in situ for at least 15 years, and current tenants are disgruntled at potentially having their leases terminated early to enable this development to proceed (as opposed to the site "no longer meeting tenant requirements" as asserted at p20 EIS).

There should be no need for fabrication if the development is so meritorious and has no adverse impacts. The fact is that Goodman's desire to extract maximum value from the site, without regard to its neighbours, is driving this development, not a desire to upgrade the property to meet the market.

Urbis' reaches excessive and unwarranted conclusions that the location is:

- 'highly suitable' (p5);
- "the project does not result in **any** significant impacts";
- "**no** adverse environmental, social or economic impacts will result from the proposal".

Not a single adverse impact? The fact that Goodman/Urbis will not concede the possibility that there could be **even one** adverse impact from the development is an extraordinary position, stated with concerning bravado, and can only be viewed as unwarranted confidence to point of being knowingly false and misleading.

Had Goodman and Urbis expressed their views more moderately and realistically, they would be more credible.

3. Visual bulk and form

Built form assessed by reference to neighbours in the business park not equally close residential neighbours

Goodman/Urbis considers the built form from the perspective of the industrial users to the north and west of the site and makes much of the frontage and streetscape from Mars Road in the business park - where NOONE is driving or standing because it is the end of a culdesac.

Goodman/Urbis do not adequately consider the built form from the perspective of the low rise residents and primary school IMMEDIATELY to the east, north-east and south-east of the site.

The EIS refers to the proposed development being compatible with the character of the surrounding area, but only views the surrounding area as the adjoining business park (p22 EIS), when the residential area is just as close and equally part of the surrounding area.

This is apparent from the fact that **none of the ground level photos in the EIS show the proximity of family homes to the proposed development site.**

The Landscape Report's street-frontage section focuses on screening the built form and substation from Mars Road. The most sensitive receivers are to the east and south, including residential properties, Blackman Park and the Community Nursery. Design mitigation appears concentrated on the public street frontage, while the more sensitive residential, park, school and nursery interfaces are not adequately assessed.

Urbis assesses the visual impact is nil to low. This is despite:

- the staggering fact that the proposed development at 28.3m high exceeds the 18m maximum building height control by 10.3m (**ie, exceeds the maximum permitted height by a whopping 57%**) and yet Urbis disingenuously states, without justification, that this will not result in **any** adverse environmental impacts (p56 EIS);
- the mechanical plant (generators, chillers and water towers) will be located at roof level – **does this mean this mechanical plant (and louvres) do not count as part of the height of the development as they sit on the roof, so the actual height of the building and plant is greater than 28.3m?**;
- the proposed data centre will be taller than **all** surrounding buildings in the Lane Cove Business Park.

Goodman and Urban propose this height 'variation' (ie, exceedance) to 'satisfy the operational requirements of the data centre'. That is to say, the height control must be increased to accommodate the data centre, rather than the proposed data centre design

being modified to accommodate the height restriction. **Again, this is the tail wagging the dog.**

Visual impact

The proposed data centre buildings are:

- monolithic in scale - both mass and height;
- windowless;
- industrial-looking; and
- grey concrete buildings.

They will dominate the surrounding homes, Blackman Park and streetscape. They are certainly out of visual character with the residential neighbourhood and create visual intrusion.

Visual amenity for surrounding residential areas and Blackman Park is not adequately demonstrated by the highly selective viewpoints points. While the Visual Impact Assessment acknowledges potential views of the data centre from 10 Banksia Close, approximately five Wood Street dwellings, and other Wood Street dwellings, it concludes impacts are low. Significantly, however, it is not prepared to submit any specific photos from those closest homes to the approving authority, lest its conclusions be obviously contradicted, which speaks volumes of the integrity of the Visual Impact Assessment.

Similarly, Blackman Park is clearly a major visual, social and sensitive receiver but is under-represented in the submitted photos. The Visual Impact Assessment baseline recognises Blackman Park directly south of the site, including sporting fields, dog park, tennis club and skate park, but the assessment is limited when compared to the diversity and number of Blackman Park use areas.

Further, the Visual Impact Assessment relies on the presence of vegetation, **and 41% of the trees on site will be removed** if this development is approved. Of 222 trees currently on site, **90 will be removed** and 132 will be retained (with the Architectural Design Report saying that mature trees have been retained extensively toward the south – not east where residents are and which boundary has the smallest proposed setback). Any replacement plantings will take decades to reach the maturity of the trees which Goodman proposes to remove.

Finally, the EIS lists 24.7% tree canopy. The Urban Heat Advice lists 29.6% canopy. The community should be told which number is correct and whether it meets the relevant Council target.

The setbacks of the proposed building are smallest on the eastern boundary, which is the boundary separating the data centre from residences. It is inconceivable to me that this should be the boundary with the smallest set back. Further, the driveway which is closest

to residents has been designated for access by trucks and other heavy vehicles. This is thoughtless at best.

4. Noise

I am particularly concerned about noise emissions from the proposed development from:

- mechanical plant, including HVAC and air-cooled chillers and associated compressor systems (situated on the roof and operating continuously 24/7);
- 49 diesel generators (again, on the roof, especially during testing which will total about 3 weeks every year when taking into account the permitted testing hours); and
- IT load.

While much focus is understandably placed on the thumping noise made by the 49 diesel generators, air-cooled chiller installations are also a well-documented source of intrusive industrial noise, characterised by continuous 24/7 operation, pronounced tonal components (from compressors and fan blade pass frequencies), and low-frequency energy. These characteristics are likely to cause significant aggravation for residents, students and wildlife.

The Noise Assessment includes mechanical plant data, octave-band information and indicative noise sources, including cooling tower sound, power, data and warnings that frequency inverters can increase sound levels. However, conclusions about operational noise are being drawn before final plant, louvre and silencer requirements are fixed.

In accordance with the NSW Environment Protection Authority Industrial Noise Policy (INP) and its successor, the Noise Policy for Industry (NPfI), the assessment of such noise sources must incorporate:

- project-specific noise trigger levels derived from background noise (RBL) measurements;
- modifying factors, including +5 dB penalties for tonal, low-frequency, or intermittency characteristics; and
- consideration of sleep disturbance criteria for night-time operations when chillers and compressors will be running 24/7.

The night-time period (10pm to 7am) is of particular concern but also importantly, during the daytime, many people now work from home and the local school, which is 160m away, is seeking to teach students in an environment conducive to learning and development.

Background noise levels in Lane Cove West are low, especially at night. I say this as a 13-year resident of Cullen Street who has spent many nights awake in the early hours caring for babies. This of course means that even moderate plant noise may exceed the project-

specific noise criteria once modifying factors are applied. **Further, as more noise mitigation would be required, this increases the heat rejection issues with the site.**

Of particular concern are:

- compressor-generated tonal noise in the 50–500 Hz range, which can propagate over long distances with minimal attenuation;
- low-frequency noise (<125 Hz), which is less effectively mitigated by standard acoustic barriers especially due to mechanical plant on the roof of the proposed development which is not encased;
- cumulative noise impacts from multiple chillers operating simultaneously under peak thermal load conditions; and
- potential exceedance of intrusiveness criteria (background +5 dB) at nearby residential receivers.

The proposal documentation does not appear to adequately demonstrate:

- a detailed spectral (frequency-based) assessment of plant noise emissions;
- application of appropriate modifying factor penalties as required under the NPfI;
- predicted noise levels at the most affected residential homes under worst-case operating scenarios;
- consideration of meteorological effects (e.g. temperature inversions, downwind propagation), which can significantly increase noise impacts;
- the impact of Blackman Park which creates a natural amphitheatre to enhance and circulate noise;
- the impact on Blackman Park (with the Social Impact Assessment Blackman Park amenity as negligible after mitigation, without meaningfully assessing the lived impact of generator testing on Blackman Park users who attend the park for recreation, nature and relaxation).

The approval authority should require as a minimum:

1. a comprehensive, independent acoustic assessment prepared in accordance with the NPfI, including octave or one-third octave band analysis;
2. explicit identification and quantification of tonal and low-frequency components, with appropriate penalty adjustments;
3. assessment of cumulative and worst-case operational scenarios (all chillers and diesel generators operating at maximum load).

In the absence of a robust and transparent demonstration that these requirements can be met, the proposal presents an unacceptable risk to residential amenity in the form of constant noise, particularly in relation to sleep disturbance and long-term noise exposure.

5. Air quality

The proposal includes diesel backup generators, which obviously introduce:

- air pollution during testing and operation;
- potential exposure to particulates and NOx emissions; and
- odour and intermittent disturbance.

In a location close to homes, schools, parks and childcare centres, this presents a clear and ongoing health concern for humans and animals alike.

Other objecting submissions have dealt comprehensively with air quality issues, and I adopt those submissions.

6. Water consumption

Goodman is yet to make a s73 application to Sydney Water, so nothing is yet known about how Sydney Water will assess the proposed development and what infrastructure upgrade will be required by way of a Notice of Requirements.

What is acutely known, through lived experience, is that a Sydney Water subcontractor, Interflow, has been camped outside our home at the intersection of Cullen Street, Hallam Avenue and Banksia Close in Lane Cove West for **18 months** extensively digging up and tunneling under the road through substantial pits to undertake works to install a 300mm pipeline to support the AirTrunk data centre at the western edge of the Lane Cove West business park. The scale of this pipeline required for **1 data centre** can be compared to the existing 200mm pipeline which services the **whole** of the rest of the Lane Cove West business park.

Although Goodman and Urbis are coy about it in the EIS, to the point of avoidance, it is self-evident that these Lane Cove West residential roads will again be dug up for at least 18 months if the proposed development is approved, given that the sewer main currently servicing the proposed site is only 225mm (p17 EIS).

7. Security, risk and safety

Security threats

In the context of digital infrastructure being the new frontier for mass threats, the proposed development constitutes a real and increased threat to the safety and security of immediately adjacent residents, families and children. This is self-evident from the fact that data centres are monitored by 24/7 security, and the EIS sets out strict security measures and vehicle traps which are proposed to be utilised.

This presents a genuine danger and materially heightened security risk to residents and families, including pre-school children attending the nearby childcare centre

(MindChamps in Chaplin Street in the business parks) and school children and families attending Lane Cove West Public School (160m away).

Fire and life safety

The proposal introduces elevated risks through:

- substantial on-site storage of diesel fuel for generators in 8 bulk fuel storage tanks;
- high electrical and IT loads; and
- perhaps most concerningly, 198,000kg of lithium ion batteries which it is well known cause and sustain fires which cannot be extinguished, and which will be permanently electrified.

We are warned not to keep mobile phones or ebikes charging all the time or overnight in confined spaces, yet there is a veritable powder keg of lithium ion batteries proposed for this development in a confined space right next to our homes.

The Dangerous Goods Report notes lithium ion thermal runaway may continue even with water and sprinkler systems are intended to attenuate radiant heat/cool modules rather than extinguish the reaction. However, the Social Impact Assessment still rates operational health/wellbeing and cumulative social impacts in low/negligible terms.

These risks are simply not appropriate in proximity to residential dwellings and a school, particularly given the proposed scale of the facility.

The Dangerous Goods Report identifies the need for a DG Risk Assessment and Emergency Response Plan. That is, the DG Report seems to simply accept that dangerous goods risks are manageable, but key operational safety documents are incomplete or non-existent at this stage. Similarly, the Fire Safety Concept Strategy says a fully prescriptive NCC DtS approach is unlikely to satisfy the desired design, multiple Performance Solutions are proposed, and the complete fire engineering analysis will be included in a future Fire Engineering Report.

Fire and Rescue NSW has confirmed that it has not received required fire safety documentation for the Air Trunk data centre on the western side of the Lane Cove Business Park (source: In The Cove, local online news and community site). The fire authorities have also indicated that they have not confirmed the Air Trunk facility meets operational fire safety requirements. In the same way as Goodman's EIS, earlier planning assessment documents for the Air Trunk facility had already noted missing emergency response plans and the need for updated fire studies. Proper detailed fire safety impact and mitigation assessment is surely a mandatory requirement before the planning authority could even consider approving Goodman's proposed development, given the substantial and complex fire risks outlined above arising from, among other things, diesel fuel, lithium ion batteries and electricity loads.

8. Property value and amenity

The Lane Cove West community largely comprises young families and retirees. I say this as a resident of the community for 13 years. The homes in Lane Cove West are more affordable, albeit still expensive, because they are not in Lane Cove 'proper' (ie, on the eastern side of Centennial Avenue) and offer a small pocket of quiet, leafy, low residential suburbia in this city.

It is not an exaggeration to say that the Lane Cove West pocket represents a community almost from a foregone era where kids still jump on their bikes and round up other children for a play before returning home at dusk. My family has always greatly cherished this safe aspect of our community.

The value of our homes can only be negatively and significantly impacted by the development of a heaving 24/7 data centre on our doorstep with 49 generators, due to the increased security risk, the loss of the local character and amenity of this quiet, suburban locale and the loss of quiet enjoyment of our homes.

Under s4.15 of the *Environmental Planning and Assessment Act 1979* (NSW), the consent authority must consider impacts on the built environment and local community.

This proposal involves:

- 24/7 operation;
- continuous mechanical plant noise from chillers and water towers (which are in use 24/7);
- intermittent high-impact generator testing for 49 diesel generators which are in use for nearly 3 weeks a year for testing and then in situations where power is lost, there are 'brownouts' or 'sagging' or power supply is not harmonic.

These are fundamentally incompatible with nearby residential uses, particularly in a quiet, established suburb like Lane Cove West.

Noise travels, particular in quiet neighbourhoods. This is ably demonstrated by the fact that I have recently heard, from my lounge room, the fireworks from Mrs Macquarie's Chair in the city at 8.45pm every evening while the Phantom of the Opera has been performed. If I can hear fireworks from the city, it is no stretch to imagine the noise I will hear from this proposed development.

Why do residents get a reprieve from aircraft noise from 11pm to 6am but we will be subjected to data centre noise 24/7/365??

9. Cumulative impacts

The EIS suggests that data centre developments in Macquarie Park and North Ryde are 'nearby' projects which give credence to this being an appropriate site for data centre

development. This is a false comparison. None of those developments, which are located some km away, impact Lane Cove West residents, schools or Blackman Park.

Approval of this Goodman project would:

- set a precedent for similar developments in locations immediately adjacent to residential areas;
- gradually erode planning protections for residents; and
- encourage further non-compatible land uses, particularly as data centres like to deploy the concept of “availability zones” to justify data centre clusters, despite the cumulative impacts of clustering on power, water, heat, diesel storage, lithium ion batteries, generator testing, construction are not properly addressed.

This is contrary to sound strategic planning on for a business park immediately adjacent to quiet, suburban residences.

10. Employment opportunities

The impact on job creation is grossly overstated – yes, there will be construction jobs during that phase of development, but for the remaining 50 or so years of the proposed project, a meagre **26** employees are anticipated for a 24/7 operation for an investment of nearly \$800 million – that is **\$31 million for each 1 permanent job created**. More than 26 people already work in the buildings currently on the proposed development site! Goodman engaged more than 26 people to prepare the EIS.

11. Sustainability

The EIS refers to the proposed development being “sustainable”(p5) and speaks of the design using “sustainability measures to reduce energy consumption” (p7). This statement can only be described as, at best, misleading in the context of a proposed development which anticipates using:

- 81mW of power per year (equivalent to the power used be around 100,000 homes, which is 83 times the number of homes in Lane Cove West); and
- 510,009m3 of water per annum (the equivalent of 200 Olympic swimming pools per year).

Even accepting that measures may be taken to reduce energy consumption, the overall energy consumption of this proposed development, entailing its own substation, is staggering. A reduction of energy usage from such a high base is token.

The Infrastructure Report says solar with battery storage is “not suitable,” wind with battery storage is “not suitable,” hydrogen fuel cells are “not suitable,” and green hydrogen/HVO are not suitable in the near term. Diesel generators are listed as “suitable.” Despite dismissing all alternative and more sustainable options, Goodman and Urbis repeat a mantra that the proposed development is “sustainable”.