

Subject: Objection to Project Atlas Data Centre, 10 Roberts Road, Eastern Creek, SSD-101067971

To the Department of Planning, Housing and Infrastructure,

Lane Cove Responsible Planning objects to the proposed Project Atlas Data Centre at 10 Roberts Road, Eastern Creek.

We recognise that data centres form part of modern digital infrastructure. Our objection is not based on opposition to technology. It is based on the scale, intensity, cumulative impact and environmental risk of this proposal, and the broader failure of the current planning framework to properly assess hyperscale data centres as major industrial infrastructure.

This proposal should not be treated as an ordinary industrial development. The EIS describes a 500 MVA, 348 MW data centre on a site of approximately 168,574 square metres, with 24/7 operation, two data centre buildings, rooftop plant, diesel storage tanks, water tanks, substations, offsite enabling infrastructure and connection to TransGrid's Sydney West Substation. The Greenhouse Gas Assessment material also identifies 249 diesel powered backup generators.

In practical terms, this is a major energy, emissions and infrastructure project. It brings permanent environmental, amenity and cumulative impacts. It should be assessed to that standard.

The proposal is too intrusive for the surrounding area

The project documents rely heavily on the industrial zoning and strategic employment context of Eastern Creek. That is not enough.

Data centres of this scale are not comparable to normal warehouses or light industrial uses. They operate continuously. They require large amounts of electricity. They contain extensive rooftop mechanical plant. They rely on large scale diesel backup generation. They create ongoing noise, heat, servicing, traffic, visual bulk, fire risk and air quality issues.

The AQIA identifies that the proposal includes demolition, bulk excavation, vegetation clearing, 24/7 operation, rooftop plant, diesel storage tanks, water tanks, substations, vehicle access for 20 metre articulated vehicles and drainage infrastructure. These are not minor site works or low impact industrial activities.

The Department should not accept the proposal simply because it is permissible within an industrial area. The proper test is whether the scale, intensity and risk profile of this particular use is suitable for this location, taking into account nearby sensitive receivers, public recreation land, environmental land, existing industrial impacts and other data centre projects in the area.

The current material does not demonstrate that convincingly.

The Department must request a more stringent EPA assessment of air quality

Lane Cove Responsible Planning asks the Department to request a more stringent and independent assessment from the NSW EPA before any determination is made.

The applicant's air quality assessment should not be the final word on air quality risk. This proposal includes hundreds of diesel backup generators and sits within an emerging data centre cluster. The assessment relies on modelling assumptions about generator use, maintenance testing, emergency operation and staggered operation with other facilities. Those assumptions need direct EPA scrutiny.

The EIS confirms that the proposal will include petroleum products in excess of 2,000 tonnes, lithium-ion batteries in excess of 2,000 tonnes, and backup generator operation estimated at less than 200 hours per year. It states the activity is considered a scheduled activity under the POEO Act because of chemical storage and will require an Environmental Protection Licence from the NSW EPA.

That is a serious point. If the proposal requires an EPL and EPA controls after approval, the Department should seek detailed EPA assessment before approval. Air quality protection should not be deferred to a later licensing stage after the planning decision has effectively locked in the development.

A key concern is that the mitigation measures do not require diesel particulate filters or Selective Catalytic Reduction to be installed from the start. The proposed mitigation only requires that the generator design does not prevent future retrofitting of additional air pollution control equipment, such as SCR.

That is not an adequate safeguard. If this technology may be needed in the future, it should be required upfront. A future retrofit pathway is not the same as actual protection.

The Department should ask the EPA to explain clearly why best available emissions controls, including diesel particulate filters and SCR, are not being required from day one for a hyperscale data centre of this size.

Communities should not be asked to accept unfiltered diesel emissions on the basis that operating hours are expected to be limited, emergency use is considered unlikely, or testing may be staggered. These are assumptions. They are not controls.

Sensitive receiver locations must be independently verified

The Department should independently verify the real location of all sensitive receivers before accepting the applicant's air, noise and social impact conclusions.

This is not a minor mapping issue. In Lane Cove West, the Project Mars assessment material misrepresented the proximity of residential receivers, with documents referring to homes much further away than they actually are. That raised serious concerns about the reliability of proponent led assessments and the risk of decision makers relying on incorrect or incomplete location data.

That mistake must not be repeated here.

For Project Atlas, the Department should require independent GIS verification of the closest dwellings, childcare centres, schools, public recreation areas, environmental land, walking routes and workplaces. The air quality and noise assessments should then be updated using the closest actual receivers, not only representative receivers selected by the applicant's consultants.

The AQIA states that sensitive receptor locations are part of the assessment and includes a figure showing sensitive receptors and population density surrounding the proposal site. However, representative modelling is not enough for a project of this scale. The Department should confirm the real world location of all sensitive land uses and require revised modelling if closer or more sensitive receivers are identified.

Cumulative impacts have not been dealt with to the standard required

The most serious weakness in this application is the treatment of cumulative impact.

The AQIA acknowledges that its cumulative impact assessment is a project level assessment and that cumulative impacts may arise from the combined effects of multiple projects in an area. That is exactly the issue here. This proposal is not isolated. It sits within a growing data centre cluster in Western Sydney.

The AQIA identifies nearby data centre projects with potential cumulative air quality impacts. It identifies the CDC Data Centre at 17 Roberts Road, only 0.04 km from the proposal site, and states there is potential for cumulative operational impacts between that 169 MW facility and the proposed 348 MW Project Atlas, particularly during emergency conditions. It also states that the proposal may result in significant cumulative air quality impacts.

The AQIA also identifies NEXTDC S4 at Horsley Park, with 232 MW power and 98 generators, and states that simultaneous backup generator operation with Project Atlas during widespread grid outages may temporarily increase local emissions. It again identifies the potential for significant cumulative air quality impacts.

Despite that, the conclusion still relies on assumptions that routine testing will be short, staggered and physically separated, and that emergency scenarios are subject to EPA allowances and controls. That is not enough.

A regional or catastrophic grid outage is exactly the kind of scenario that could affect multiple data centres at the same time. Treating this as unlikely does not remove the need for rigorous assessment. A low probability event with high consequence still needs proper planning scrutiny.

The Department should require a full precinct wide cumulative impact assessment covering all existing, approved, under construction and proposed data centres in the Eastern Creek, Horsley Park and Erskine Park area. That assessment should cover air quality, noise, low frequency noise, generator testing, emergency generator operation, commissioning, electricity demand, water demand, construction overlap, traffic, fire risk, heat, ecology and social impact.

The current project by project approach is weak. It allows each proposal to be assessed as if it is only adding a manageable increment, while the overall burden on Western Sydney keeps growing.

Noise and low frequency noise need stronger assessment

The proposal includes 24/7 operation, rooftop plant, cooling infrastructure and backup generator testing. These are continuous or repeated sources of industrial noise.

The Noise and Vibration Impact Assessment states that it assessed construction and operational noise and vibration, including maintenance testing and emergency operations, against the NSW Noise Policy for Industry. The assessment also recognises that the NSW Noise Policy for Industry includes amenity noise levels for residential receivers, schools, hospitals, places of worship, passive recreation areas and active recreation areas.

The issue is not whether the applicant can model compliance on paper. The issue is whether the real operation of a 24/7 hyperscale data centre, within a cluster of similar facilities, will create intrusive noise impacts over time.

The Department should require a more conservative noise assessment that specifically addresses cumulative industrial noise, low frequency noise, tonal noise, night time amenity, sleep disturbance, rooftop plant, generator testing and emergency operation. The assessment should also use independently verified receiver locations.

Post approval monitoring is not an adequate answer. Once a facility of this scale is built, the surrounding community is locked into the outcome. Noise issues need to be resolved before approval, not discovered after operation begins.

The greenhouse gas impact is significant and should not be minimised

The GHG Assessment states that the project meets the criteria of a large emitter and is required by the NSW Guide for Large Emitters to prepare an emissions mitigation strategy.

That alone should trigger a higher level of scrutiny. A large emitter should not be approved on the basis of general commitments, future energy procurement, offsets or efficiency measures without clear, enforceable and transparent conditions.

The assessment identifies emissions sources including diesel oil for generators, refrigerants, non-IT electricity, IT electricity, materials and construction, and water treatment and distribution. These impacts are not incidental. They are core to the operation of the facility.

The Department should require enforceable greenhouse gas conditions that are measurable, reportable and independently audited. Claims about renewable electricity, efficiency or future emissions reduction should not be accepted unless they are tied to binding conditions.

Vegetation and environmental impacts remain a concern

The proposal involves vegetation clearing and substantial site works. The Vegetation Management Plan states that vegetation on adjacent properties includes Cumberland Shale Plains Woodland, much of which corresponds to Cumberland Plain Woodland in the Sydney Basin Bioregion, a Critically Endangered Ecological Community under NSW law, and Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest, a Critically Endangered Ecological Community under Commonwealth law.

The VMP also states that the proposed development will result in removal of planted native and non-native vegetation within the majority of the data centre, except for a planted native vegetation strip along the western site boundary.

Mitigation measures, planting and management plans do not erase the impact of placing another large hardstand, energy intensive and diesel backed facility into this precinct. The Department should assess whether repeated approvals of this type are cumulatively changing the environmental character and ecological resilience of the area.

Community engagement should not be treated as proof of low impact

A lack of early community objection should not be treated as evidence that impacts are acceptable.

Many communities do not understand the scale, operating profile or cumulative risks of data centres when proposals are first exhibited. The SSD process is also difficult for ordinary residents and small businesses to engage with. Plain English materials are often limited. Technical reports are lengthy and hard to navigate.

The Department should require further public engagement that clearly explains the true scale of the proposal, the number of diesel generators, generator testing arrangements,

diesel storage, likely emissions, cumulative impacts, sensitive receiver locations, water and electricity demand, fire risk and long term operational controls.

The planning framework is not keeping pace with hyperscale data centres

This proposal shows why NSW needs stronger data centre planning controls.

Strategic support for digital infrastructure does not mean every hyperscale data centre is suitable in every industrial area. The planning system still needs to test real site suitability, cumulative impact, environmental risk, infrastructure capacity, community impact and long term public interest.

A 348 MW data centre with 249 diesel powered backup generators should not be assessed through a narrow, project by project lens. The Department should apply a higher standard.

Before approving further hyperscale data centres, NSW needs clear siting rules, enforceable separation distances from sensitive receivers, mandatory cumulative impact assessment, stronger EPA involvement, best available emissions controls, clear fire safety requirements, transparent water and electricity capacity checks, and public reporting of operational impacts.

Requested outcome

Lane Cove Responsible Planning asks the Department to refuse the application in its current form.

If the Department is not minded to refuse the application, we request that it be deferred and that Goodman be required to provide the following before any determination:

1. A full precinct wide cumulative impact assessment for all existing, approved, under construction and proposed data centres in the Eastern Creek, Horsley Park and Erskine Park area.
2. A more stringent EPA assessment of air quality, including direct EPA advice on whether the proposed generator emissions controls are adequate.
3. A clear explanation from the EPA and the Department as to why diesel particulate filters and Selective Catalytic Reduction are not required to be installed from the start.
4. Revised air quality modelling using conservative assumptions for simultaneous generator operation, emergency operation, commissioning, testing and maintenance across the wider data centre cluster.
5. Mandatory best available emissions controls from the start of operation, including diesel particulate filters and SCR.

6. Independent GIS verification of all sensitive receivers, including the closest dwellings, childcare centres, schools, public recreation areas, environmental land, walking routes and workplaces.
7. Revised air quality, noise and social impact assessments based on the closest actual sensitive receivers, not only representative receptors selected by the applicant.
8. A revised noise assessment addressing cumulative industrial noise, low frequency noise, tonal noise, night time amenity, sleep disturbance, rooftop plant, generator testing and emergency generator operation.
9. Clear enforceable limits on generator operation, generator testing hours, commissioning hours, fuel use and emergency use reporting.
10. Transparent public reporting of generator operation, emissions testing, complaints, exceedances and compliance monitoring.
11. Independent verification of electricity and water infrastructure capacity, including the cumulative demand of the wider data centre cluster.
12. Stronger greenhouse gas conditions that are measurable, enforceable, independently audited and not reliant on vague future commitments.
13. Further community consultation using plain English material that explains the true scale, operational intensity, diesel generation, cumulative impacts and long term environmental risks of the proposal.

The Department should not allow data centre approvals to run ahead of proper planning controls. Project Atlas is too large, too intensive and too reliant on assumptions and post approval management for the level of cumulative risk now emerging in Western Sydney.

Yours sincerely,

Lane Cove Responsible Planning