Re: Project Atlas, Eastern Creek Data Centre proposal (SSD-101067971)

I object to this proposal.

Having reviewed and researched quite a number of data centre projects across the Sydney basin and beyond, I could comment at great length at the discrepancies and conflicts across the Environmental Impact State (EIS) and its supporting documents. In this instance, I will leave it up to NSW Department of Planning, Housing and Infrastructure (DPHI) to fully dissect these errors and misstatements – and ensure Goodman Group furnishes the DPHI with greater granularity and accuracy across these documents before any decision is delivered.

I also note that two parliamentary inquiries are being conducted into data centres. One being at the NSW state government level with a second conducted federally. This is running alongside the finalisation of "principals" by both parliaments, although these appear to be more "vibe" like in approach with zero regulatory oversight and no authority with the teeth to ensure rules are met.

Further, with the latter driving an incessant rush of proposals through the NSW DPHI, the community is once again left with documents that have numerous errors, omissions and sleights of hand in how this particular project will be developed. Given Goodman's track record of receiving approval then increasing the size and scope (e.g., Project Duke – SSD-71368959 – whereby 90MW became 120MW. They also increased Project Apollo during the approval process from 90MW in the initial SEARS to 135MW in the EIS), will this also transpire in the same manner? With the broader NSW community being treated with contempt by the lack of transparency from these various proponents, any social licence has been completely lost. It is incumbent upon the DPHI to hold these proponents of hyperscale data centres to a higher standard and rebuild some semblance of trust in the process.

One final comment before I give more detail on my key area of concern is around the registered environmental assessment practitioner (REAP) process. Once again, the group that prepares the EIS is also signing off as being the provider of an "independent quality assurance review". A review that is supposed to ensure certain standards in relation to its completeness, accuracy, quality and clarity. I strongly urge the DPHI to change this policy! A REAP should provide a truly independent review that is at arm's length to any organisation involved in delivering the EIS.

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In terms of my specific objection to this proposal, I wish to draw attention to the statements around the requirement for an Environment Protection Licence (EPL) from the NSW Environment Protection Authority.

At various points in the documentation the proponent states that an EPL is needed as under the "chemical storage" clause as it is a *scheduled activity* (both diesel and lithium ion batteries storage requirements are well beyond limits). However, in the following section under "electricity generation" it is considered a *non-scheduled activity* due to diesel generators being operated for less than 200 hours per annum.

My immediate question is "does this proposal require an EPL?" as the EIS is not exactly transparent. If an EPL is required, does it only pertain to the storage of petroleum products and batteries? Does it only include monitoring of how this storage is undertaken? Or does it include usage rates (back up generation and / or evaporation) and movement to the site via road tankers? The second question is whether the EPL also includes the external monitoring of diesel generation (such as hours and rates of usage) and associated emissions? Or does the EPL purely relate to storage?

In the interests of the community, the EPL should cover **all** activities related to onsite diesel – from shipment in and storage to **actual** usage. The latter would provide real insight into Project Atlas' diesel generation. From the commissioning phase where such generators can take as many as 60 hours in total to calibrate (see data from overseas for examples) to ongoing testing requirements, such monitoring will clearly show whether generation exceeds the levels the proponent states in the EIS.

Furthermore, these testing levels for 249 generators remarkably fall just below the threshold for an EPL requirement under electricity generation (200 hours per annum). How is this remotely possible for a 500MW proposal when Goodman Group in its other data centre proposals always falls just under this 200 hours/annum threshold (whether it is 90MW, 120MW, 135MW)? Even more extraordinary is that all other large hyperscale data centre operators (e.g., Kemps Creek with 800 plus generators) magically fall below the 200hr/yr level. The conjuror's trick for this Goodman proposal is treating five generators as one – even though the emissions will be FIVE times as much. With such reasoning, you could find a future proposal counting all generators as a single grouping and then it will only be a few hours per year.

To be honest this is a complete joke – and again, treats the NSW community with disdain. NSW DPHI needs to step in and work with the EPA to ensure transparency, clarity, honesty and consistency across all hyperscale data centre proposals.

The NSW public deserves clean air! The public also wants to be confident that data centres are being closely monitored – whether it is diesel emissions, noise exceedances, etc., with real mitigation requirements in place.