

Submission Opposing Project Mars Data Centre Development

Application Reference: SSD-82052708

Submitted by: Resident of Wood Street, Lane Cove West NSW 2066

Introduction

I am writing as a resident of Wood Street, Lane Cove West, located less than 300 metres from the proposed Project Mars Data Centre at 12 Mars Road. I formally and strongly oppose this development.

I have reviewed the Environmental Impact Statement (EIS) in detail and have identified serious concerns across a wide range of impact categories. My concerns are heightened by the presence of young children in my household, one of whom has autism, the proximity of Lane Cove West Public School, and the documented failure of regulatory oversight of the existing data centre in this same business park. The following submission sets out my objections with reference to credible, published evidence, and poses specific questions for the NSW Planning Minister and the applicant, Goodman Group.

1. Factual Clarification — Scale of the Proposal: 90 Megawatts

The planning application and EIS confirm that Project Mars will operate with a total power consumption of approximately 90 megawatts (MW) — not the 50MW figure discussed in some earlier community communications. This is critical context because every environmental impact described in this submission — noise, heat, water consumption, fire risk, emissions, and grid strain — scales with the energy throughput of the facility. A 90MW data centre is among the largest single facilities ever proposed in a setting like Lane Cove West.

Source: NSW Planning Portal, SSD-82052708; Goodman Group SEARS application, 18 March 2025.

2. Cumulative Impact — A Hyperscale Data Centre Cluster is Forming

Project Mars cannot and should not be assessed in isolation. Lane Cove West Business Park is rapidly becoming one of the most concentrated hyperscale data centre zones in New South Wales. The following facilities are already operating, approved, or proposed within the same business park:

- AirTrunk SYD2 — currently operating at 1 Sirius Road, with a capacity exceeding 110MW.
- AirTrunk Apollo Place — a second facility on Apollo Place that has recently been approved.
- AirTrunk third facility — a further neighbouring expansion by AirTrunk has been signalled.
- Goodman Project Mars — 90MW proposed at 12 Mars Road (this application).

- Lane Cove DC Alliance — has signalled intent to build at 16 Mars Road.

If all proposed facilities proceed, four or more hyperscale data centres will be operating side by side in a single suburban business park, each running 24 hours a day, seven days a week, and collectively drawing hundreds of megawatts of power and billions of litres of water annually.

Lane Cove Council has specifically called for a cumulative impact assessment. The EIS for Project Mars does not provide one. Assessing this application as if it exists in a vacuum — without reference to the noise, heat, traffic, water, and power impacts of the existing and approved cluster — is a fundamental failure of the environmental assessment process.

I ask that the Department of Planning, Housing and Infrastructure require a comprehensive, independent cumulative impact assessment for all data centre facilities proposed or operating in the Lane Cove West Business Park before any new consent is granted.

Source: In the Cove, "Government Regulators Drop the Ball as Data Centre Proposals Soar", 28 April 2026; Lane Cove Council, Data Centre proposed for 12 Mars Road, lanecove.nsw.gov.au.

3. The AirTrunk Compliance Failure — Why Conditions of Consent Are Not Enough

The most important context for this submission is what has already happened with the approved data centre in this very business park. AirTrunk's SYD2 facility (SSD-9741) was granted development consent in 2019 with mandatory reporting obligations designed to ensure its real-world impact matched what had been approved. Those obligations have not been met, and the consequences are already being felt by the community.

Missing Compliance Reports

Investigative reporting published in April 2026 by In the Cove, following direct enquiries to NSW Planning, has confirmed the following:

- Noise Verification Reports — required within three months of each phase commencing operation — have not been submitted for Phase 2 or Phase 3. AirTrunk's own press release confirms Phase 3 commenced operation in August 2024. That deadline has passed by more than a year.
- The Long Term Environmental Management Plan — required to be submitted prior to operation following a Site Audit — has not been submitted. Operations commenced in March 2021. This report is now five years overdue.
- The Back-up Generator Log — required to be maintained for the life of the development and made available to NSW Planning on request — has not been published.

Actual Noise Has Already Exceeded Predicted Levels

The purpose of staged noise verification reports is to detect exactly this kind of problem. NSW Planning's own assessment for SSD-9741's third modification found

that Phase 1 alone — representing just 25% of the full facility — was already operating 5 dB(A) louder than the noise predicted for all four phases combined. The discrepancy was attributed to chiller fan speed loads running at 60% rather than the modelled assumption of 35%.

Consequently, operational noise from Phase 1 was found to exceed the approved night-time noise limit of 43 dB(A) at the nearest residential receivers — the Arise Lane Cove apartment tower at 150 Epping Road — by 11 dB(A). The World Health Organisation recommends that community noise levels in bedrooms at night should not exceed 30 dB(A) for good-quality sleep, with individual events not exceeding 45 dB(A). The measured exceedance at a real residential building near this facility is extreme.

Source: NSW Planning, SSD-9741-Mod-3 Assessment Report, June 2024; WHO Environmental Noise Guidelines for the European Region (2018), WHO/Europe; In the Cove, 28 April 2026.

Fire Safety Misrepresentation

During the Mod-3 process in September 2023, AirTrunk told NSW Planning that a revised Fire Safety Study had been submitted to Fire and Rescue NSW (FRNSW) for the existing SYD2 facility. In July 2025, FRNSW formally contradicted this claim in writing. Senior Firefighter Michael Millar of FRNSW's Fire Safety Liaison Unit wrote that "contrary to the responses provided for SSD-9741-Mod-3... a revised Fire Safety Study has not been submitted to FRNSW for review for the existing Lane Cove West Data Centre facility and FRNSW has not provided a response that the facility meets FRNSW's operational requirements."

A false statement was made to a regulator in 2023. It was not verified for two years. NSW Planning is the sole compliance regulator for this facility — there is no EPA licence, no other agency with oversight. This is not a minor administrative gap. It is a structural failure of the entire compliance model.

What This Means for Project Mars

Goodman's application relies heavily on conditions of consent as the mechanism for protecting the community — noise management plans, monitoring commitments, operational constraints. The AirTrunk record demonstrates conclusively that these conditions are routinely not met, not reported, and not enforced. Granting a further 90MW consent in the same business park under the same model, without first fixing the compliance failures already documented, would expose this community to unacceptable and unmonitored risk. I strongly submit that no new consent should be granted in Lane Cove West until AirTrunk's outstanding obligations are enforced and a more robust, independent compliance framework is in place.

Source: In the Cove, 28 April 2026; FRNSW letter to Jeffrey Peng, NSW Planning, 11 July 2025; NSW Planning Portal, SSD-9741.

4. Proximity and Health Impacts

EIS Reference: Sections 2.3 (Site Context) and 8.4 (EMF and Air Quality)

The EIS acknowledges that homes on Wood Street sit approximately 230 to 280 metres from the proposed site, and Lane Cove Council has noted that the structure will sit just over 100 metres from the nearest residential buildings. Despite this, the

EIS does not meaningfully address the specific health implications of placing a 90MW facility this close to where people live.

Electromagnetic Fields (EMF): The EIS states that EMF emissions will fall within regulatory limits based on broad modelling rather than detailed, independent, site-specific measurements. There has been no assessment of how a large, multi-storey, 90MW facility in this specific residential context may differ from the modelled scenarios.

Air Quality: The approach relies on predictive modelling rather than real-time monitoring. This does not account for the particular vulnerabilities of children, or the cumulative air quality effects of multiple large diesel generator fleets operating in close proximity — including the already-operating AirTrunk facility.

Diesel Generator Emissions: The EIS confirms the inclusion of diesel storage tanks and diesel generators on site. Large diesel generators are a source of particulate matter (PM2.5), nitrogen oxides (NOx), and carbon monoxide. During power outages or testing events, these generators run at full capacity. With multiple facilities now proposed, the cumulative diesel emission load from generator testing and operation in this single business park has not been assessed.

Research Gap: There are no longitudinal studies cited in the EIS examining the long-term health impacts on children living in close proximity to hyperscale data centres of this scale. This gap has not been acknowledged.

Questions for the NSW Planning Minister and Goodman

1. Without independent, site-specific EMF and air quality monitoring data — not modelling — how can the health of nearby residents and children be guaranteed?
2. What is the cumulative diesel emission load from all proposed and operating data centre generator fleets in this business park, and has this been modelled against relevant health standards?
3. Why does the EIS not acknowledge or address the absence of published longitudinal health studies for residential populations near 90MW-class data centres?

5. Noise Impact

EIS Reference: Section 8.2 (Noise and Vibration Assessment)

The noise assessment in the EIS focuses on predicted average levels but does not provide adequate analysis of peak noise during generator testing, maintenance, or emergency operations. Given what is now known about AirTrunk's actual noise performance in this same business park, the EIS modelling must be treated with significant scepticism.

WHO Noise Standards: The World Health Organisation recommends community noise levels in bedrooms at night should not exceed 30 dB(A) for good-quality sleep, with individual noise events below 45 dB(A). These thresholds are well below the 43

dB(A) night limit that AirTrunk has already been found to exceed by 11 dB(A) at the nearest residential building — after Phase 1 alone, at just 25% of full capacity.

Source: WHO Environmental Noise Guidelines for the European Region (2018).

Modelling Cannot Be Trusted: The existing data centre in this business park was modelled to operate at a certain noise level, and Phase 1 alone — operating chiller fans at 60% rather than the assumed 35% — exceeded that prediction for all four phases combined by 5 dB(A). The EIS for Project Mars uses similar predictive modelling. Given the demonstrated gap between prediction and reality next door, this modelling is not a reliable basis for approval.

24/7 Operation: This facility will operate every hour of every day. There will be no quiet period for the community to recover. Research consistently shows that prolonged ambient noise exposure causes chronic sleep disruption, elevated cortisol levels, and cardiovascular effects. Children are particularly vulnerable to noise-induced learning and developmental impacts.

Low-Frequency Noise: Large cooling systems produce low-frequency and tonal noise that penetrates building structures more effectively than standard octave-band modelling captures. Low-frequency noise has been specifically linked to cognitive impairment, sleep disruption, and psychological distress.

Impact on Neurodiverse Children: Children with autism spectrum disorder or auditory processing disorder — including children in my household and at Lane Cove West Public School — are disproportionately affected by continuous, unpredictable noise environments. This can trigger anxiety, sensory overload, and communication difficulties. The EIS contains no assessment of these impacts and no mitigation measures targeted at neurodiverse children. This constitutes a failure to meet obligations under the Disability Discrimination Act 1992 (Cth) and the Disability Standards for Education 2005, which require that environmental conditions, including noise, do not impair the educational outcomes and wellbeing of students with special needs.

No Enforceable Monitoring: The AirTrunk experience shows that noise monitoring conditions of consent are not enforced. Committing to conditions in this approval without a fundamentally different compliance model is not adequate protection for the community.

Questions for the NSW Planning Minister and Goodman

4. Given that AirTrunk's Phase 1 alone already exceeds the night-time noise limit by 11 dB(A) at the nearest residential building, how does the Department justify approving another 90MW facility using the same modelling methodology?
5. What independent, real-time noise monitoring — not modelling — will be required, by whom, and with what enforceable consequences if limits are exceeded?
6. What specific, enforceable noise mitigation measures will be required to protect neurodiverse children, and how will compliance with the Disability Discrimination Act 1992 and Disability Standards for Education 2005 be assured?

6. Water Consumption

EIS Reference: Section 8.10 (Water and Waste Management)

The EIS refers to cooling water demands vaguely. The actual scale of water consumption at 90MW is not quantified and is severely understated.

Peer-reviewed research published in *npj Clean Water* (a Nature publication) found that a 1MW data centre can consume up to 25.5 million litres of water annually for cooling alone. Applied to a 90MW facility, this extrapolates to approximately 2.3 billion litres of water per year — equivalent to the annual drinking water of hundreds of thousands of people.

Source: Mytton, D. (2021), "Data centre water consumption", npj Clean Water, Nature Publishing Group. DOI: 10.1038/s41545-021-00101-w.

Sydney Water is already undertaking significant infrastructure upgrades to supply additional water to the existing AirTrunk facility in the same business park. The cumulative water demand of multiple hyperscale data centres in this location — against the backdrop of increasing drought frequency and water stress in eastern Australia — is not addressed in the EIS.

The EIS contains no binding commitment to water efficiency standards, recycled water use, or drought contingency planning. There is no assessment of the impact on local stormwater, groundwater, or catchment health from a facility of this scale.

Questions for the NSW Planning Minister and Goodman

7. Based on published data, this facility could consume approximately 2.3 billion litres of water per year. Why does the EIS not quantify this figure, and what binding water efficiency commitments will be required as a condition of consent?
8. What is the combined water demand of all approved and proposed data centres in this business park, and has this been assessed against Sydney Water's long-term capacity and drought risk projections?

7. Fire Safety and Emergency Procedures

EIS Reference: Section 8.11 (Fire Safety Risk Assessment)

Data centres present distinctive fire risks due to the density of electrical equipment, large lithium-ion battery storage systems, and the use of chemical fire suppressants. The EIS provides generic fire safety protocols without scenario-specific analysis relative to the neighbouring homes, school, childcare centre, and parkland.

No Evacuation Planning: There is no tailored evacuation planning for this specific residential and recreational context — including Blackman Park immediately to the south, which is used by families and children.

Battery Fire Risk: Lithium-ion battery storage systems, used for UPS (uninterruptible power supply) in data centres, are a recognised and serious fire risk. Thermal runaway events in battery systems can release toxic gases including hydrogen fluoride, carbon monoxide, and hydrogen cyanide. The EIS does not model the dispersion of toxic smoke from a battery fire event under the relevant wind conditions to the surrounding residential areas.

AirTrunk Fire Safety Precedent: As documented in Section 3 above, AirTrunk made a false statement to NSW Planning about fire safety compliance for SYD2, which went unchecked for two years. FRNSW confirmed in July 2025 that "a revised Fire Safety Study has not been submitted to FRNSW" and that "data centres present special problems of fighting fire." This is the regulatory environment in which Goodman's application is being assessed. The EIS fire safety chapter cannot be taken at face value.

Questions for the NSW Planning Minister and Goodman

9. Has Fire and Rescue NSW been consulted about this specific application, and has FRNSW confirmed in writing that it is satisfied with the fire safety study — given its experience with the adjacent facility?
10. What is the modelled toxic smoke dispersion scenario from a battery thermal runaway event, and how are residents, park users, and school children protected?
11. What independent verification process will ensure fire safety conditions of consent are actually met, given AirTrunk's documented misrepresentation of fire safety compliance in the same business park?

8. Urban Heat Island Effect

The EIS does not address the Urban Heat Island (UHI) effect created by a 90MW data centre operating 24/7 in close proximity to a residential neighbourhood and public parkland. This is a significant omission.

A peer-reviewed study published in 2024 and widely reported in April 2026 quantified what researchers termed the "data heat island effect," finding that land surface temperatures increased by an average of 2°C after the start of operations of an AI data centre, with temperature effects measured up to 10 kilometres away. Separate modelling research published in MDPI's *Atmosphere* journal found that the physical footprint and heat output of large data centres can create localised microclimate warming in surrounding residential areas, increasing air-conditioning demand and exacerbating heat stress in vulnerable populations — particularly the elderly, children, and those with respiratory conditions.

Source: "The data heat island effect: quantifying the impact of AI data centers in a warming world", ResearchGate (2024); MDPI Atmosphere, 2022; Dezeen, "Study links data centres to heat island effects worldwide", 9 April 2026.

The cumulative heat output of four or more hyperscale data centres operating in the same business park — with a combined capacity potentially exceeding 400MW — has not been assessed. Blackman Park, which adjoins this site to the south, is an

outdoor recreational space used by families and children. Increased local temperatures directly affect the usability and safety of this space during summer.

Questions for the NSW Planning Minister and Goodman

12. What independent thermal modelling has been conducted to assess the Urban Heat Island impact of this facility, including cumulative effects with the existing AirTrunk cluster, on Blackman Park and surrounding residential streets?
13. What measures will be taken to mitigate heat island effects, and will these be enforceable conditions of consent?

9. Legionnaires Disease Risk from Cooling Towers

Large-scale data centres require industrial cooling towers, which are an established vector for *Legionella pneumophila* — the bacterium that causes Legionnaires' disease, a potentially fatal form of pneumonia with a mortality rate of between 3% and 33% depending on the population affected.

Published research in the *International Journal of Environmental Research and Public Health* (PMC, 2017) found that the population living within 500 metres of any cooling tower had a relative risk of *Legionella* infection more than three times that of people living further than one kilometre away. My home at 57 Wood Street is less than 300 metres from this proposed facility. Lane Cove West Public School is similarly close.

Source: Nguyen, T.M. et al. (2006), "Proximity of the home to a cooling tower and risk of non-outbreak Legionnaires' disease", Epidemiology and Infection, PMC1676166; CDC, "Controlling Legionella in Cooling Towers", cdc.gov.

Testing in comparable settings in Europe has found *Legionella* present in nearly a quarter of cooling tower samples. The EIS does not include a site-specific *Legionella* risk assessment or binding water treatment and monitoring commitments for the cooling towers at this facility. Given the proximity to a school and hundreds of residential properties, this is not an acceptable omission.

Questions for the NSW Planning Minister and Goodman

14. What site-specific *Legionella* risk assessment has been completed, and what independent monitoring of cooling tower water quality will be required as a condition of consent?
15. Given that residents within 500 metres of cooling towers face more than three times the baseline infection risk, how will Goodman ensure cooling tower water management protects nearby residents and children?

10. Environmental Harm

EIS Reference: Sections 8.5 (Air Quality), 8.6 (Biodiversity), and 8.10 (Water and Waste Management)

The EIS relies on "offsite offsetting" and "best practice energy management" to minimise the apparent environmental footprint. These measures are inadequate.

Energy Consumption and Carbon: At 90MW of power demand, this is an enormous energy draw. The Australian Energy Market Operator's Data Centre Energy Demand Final Report (July 2025) found that data centres in Sydney already account for approximately 4% of NSW's grid-supplied electricity, and this could rise to 11% by 2030. The Western Sydney Regional Organisation of Councils has noted that estimates from Morgan Stanley suggest data centre consumption could reach 15% of Australia's total electricity demand by 2030 — equivalent to the entire manufacturing sector. The EIS contains no binding commitment to 100% renewable energy, no full disclosure of the facility's carbon footprint over its operational life, and no credible pathway to net zero.

Source: AEMO, "Data Centre Energy Demand Final Report", July 2025; WSROC Policy Position, January 2025; Morgan Stanley research cited in The Conversation.

Biodiversity: The site requires removal of remnant vegetation and will affect local fauna corridors. Lane Cove Council has specifically flagged proximity to protected bushland as a concern. The offsets proposed are theoretical and not local — they do not restore the ecological value of what is removed at this site.

Electronic Waste: Data centres require regular hardware refresh cycles, generating large volumes of electronic waste. The EIS does not include a credible e-waste management plan over the operational life of the facility.

Questions for the NSW Planning Minister and Goodman

16. Why does the EIS not include a binding renewable energy commitment and a transparent, independently verified carbon footprint disclosure for the full operational life of the facility?
17. How will the loss of local vegetation and biodiversity be mitigated on-site, rather than offset theoretically elsewhere?

11. Visual Impact, Height, and Blackman Park Overshadowing

EIS Reference: Section 8.7 (Landscape and Visual Impact)

The proposed building will be between 15 and 25 metres tall. This exceeds the applicable height standard under the Lane Cove Local Environmental Plan (LCLEP), requiring a Clause 4.6 variation. Lane Cove Council has explicitly flagged that the structure's height "far exceeds local restrictions." I object to the grant of this variation.

The site is elevated above Blackman Park — public recreation land zoned RE1 to the south — and the eastern boundary has only a 50 metre landscape setback before transitioning to R2 Low Density Residential land. A 25-metre structure with only a 50-metre setback to residential land and overlooking a public park is not appropriate in this location.

The EIS visual impact assessment uses a limited selection of viewpoints and computer-generated imagery. There are no detailed overshadowing diagrams

demonstrating impacts on Blackman Park across different seasons and times of day. There is no analysis of the loss of residential privacy for homes on Wood Street and surrounding streets, or of the loss of solar access to neighbouring properties and the park.

Questions for the NSW Planning Minister and Goodman

18. Why should the Clause 4.6 height variation be granted for a facility whose scale directly contradicts the objectives of the residential and recreation land uses immediately adjacent to it?
19. Why does the EIS not include detailed seasonal overshadowing analysis for Blackman Park, given that the facility directly overlooks it?

12. Construction Impacts

The proposal involves the demolition of four existing industrial warehouse buildings, bulk earthworks and excavation, and construction of a three-storey structure. None of these impacts are addressed in the existing submission.

Construction Traffic: Mars Road is the sole vehicle access point. Heavy construction traffic, including excavation trucks, concrete trucks, and building materials, will operate along this route for an extended construction period. The impact on residents, school drop-off and pick-up movements, and the safety of pedestrians and cyclists has not been adequately assessed.

Construction Noise and Vibration: Demolition, excavation, and pile driving generate significant noise and vibration that will affect nearby residents and the school. The EIS does not include a detailed construction noise and vibration management plan with enforceable limits for sensitive receivers.

Dust and Air Quality During Construction: Bulk earthworks at this scale will generate significant dust. Given the proximity to homes and a school, site-specific dust management measures are required.

Questions for the NSW Planning Minister and Goodman

20. What are the estimated construction hours, duration, and peak noise and vibration levels for demolition and excavation works at the nearest residential and school receivers?
21. What enforceable construction traffic management plan will be required, and how will impacts on school access and local streets be mitigated?

13. Power Grid Strain and Local Infrastructure

Lane Cove West and surrounding areas including Lane Cove North have experienced a higher frequency of power outages than other parts of the Lane Cove area. Adding a 90MW load to the local grid — the equivalent power demand of a

large industrial estate — will place significant additional strain on supply capacity and reliability.

AEMO's Data Centre Energy Demand Final Report (July 2025) found that data centres in Sydney already consume approximately 4% of NSW's grid electricity, with projections of up to 11% by 2030. Morgan Stanley's analysis suggests the national figure could reach 15%. Charter Hall chief executive David Harrison has publicly stated that Australia's energy shortfall is "as severe as its housing crisis." Adding further large-scale, uninterruptible demand in an already-stressed distribution zone is not acceptable without a robust and publicly disclosed grid capacity assessment.

Source: AEMO, Data Centre Energy Demand Final Report, July 2025; Sydney Morning Herald / AFR reporting on energy capacity concerns.

Questions for the NSW Planning Minister and Goodman

22. What independent grid capacity assessment has been conducted for the local distribution network, and how will the 90MW load requirement be accommodated without degrading power reliability for existing residents?
23. What contingency commitments has Goodman made if grid supply is insufficient, and how will the community be protected from increased outage frequency?

14. The State Significant Development Process — An Inappropriate Use of a Temporary Mechanism

The State Significant Development classification that removes Lane Cove Council's decision-making power over this application was introduced in June 2021 as a temporary measure to stimulate construction and support NSW's economic recovery from the COVID-19 pandemic. It has never been formally revoked.

This mechanism was not designed as a permanent framework for bypassing local planning controls for privately-owned hyperscale commercial infrastructure adjacent to residential land. Using it to override the Lane Cove Local Environmental Plan — including its height controls (requiring a Clause 4.6 variation) and its land use protections for adjacent residential and recreation zones — is contrary to the intent of the provision and contrary to the legitimate interests of the community.

Lane Cove Council has no power to determine this application. It can only make submissions. The community has been stripped of its normal planning protections by a mechanism that was never intended to be permanent. I ask the Minister to consider whether the SSD pathway is appropriate for this class of development, particularly in light of the documented compliance failures in this same business park.

15. NSW Parliamentary Inquiry — Approval Would Be Premature

In January 2026, a NSW Parliamentary Committee launched a first-of-its-kind inquiry into the rapid expansion of data centres in NSW. The inquiry is examining electricity demand and grid impacts, water use and drought risk, noise, heat, traffic, land-use

conflicts, and whether data centres' resource demands are impinging on housing supply. Hearings were scheduled throughout May 2026.

Source: NSW Greens, "NSW Parliamentary Committee to Scrutinise Data Centre Boom in Nation-First Inquiry"; In the Cove, 30 January 2026.

Granting consent to Project Mars while this inquiry is active and before its findings and recommendations have been made public would undermine the purpose of the inquiry. The findings may result in new policy requirements, changed planning standards, or revised assessment guidelines that are directly relevant to this application. I submit that a decision on this application should be deferred until the Parliamentary Inquiry has reported.

16. Absence of Comparable Evidence from Similar Developments

The EIS does not cite any independent case studies or precedent reviews examining large data centres of comparable scale operating in close proximity to dense urban residential areas.

Precedent Gap: Comparable facilities have typically been located in dedicated industrial zones or at a significantly greater distance from homes. There is no evidence presented that a 90MW hyperscale data centre can operate harmlessly at this proximity to residential land, schools, and public parkland.

Precautionary Principle: In the absence of reliable real-world precedent — and in the presence of documented evidence from the adjacent AirTrunk facility that real noise levels substantially exceed modelled predictions — the precautionary principle should apply. Potential harm to the health, sleep, and wellbeing of nearby residents and children is not a theoretical risk. It is already being experienced at the existing facility.

Questions for the NSW Planning Minister and Goodman

24. On what empirical basis is the claim made that a 90MW data centre can safely coexist with adjacent residential land, when the existing 110MW+ facility in this same business park is already exceeding its noise consent conditions?
25. Why has the application not been required to include independent case studies from comparable urban-adjacent facilities, as a basic evidentiary standard?

Conclusion

This EIS does not meet the standard required to approve a development of this scale and impact adjacent to homes, a primary school, childcare facilities, and public parkland. The evidence reviewed in preparing this submission — including peer-reviewed research, government documents, and published investigative reporting — identifies serious deficiencies across every major impact category assessed.

Most critically, the regulatory framework for managing data centre impacts in Lane Cove West has already demonstrably failed. AirTrunk's existing facility is operating in

breach of its noise conditions, with compliance reports years overdue, and made false statements about fire safety to regulators. Approving a second major facility under the same model, without reform, is not in the public interest.

I respectfully request that the Department of Planning, Housing and Infrastructure:

- Refuse this application in its current form, given the inadequacy of the EIS on the grounds set out above.
- Require a comprehensive cumulative impact assessment for all data centres in Lane Cove West Business Park before any new consent is granted.
- Enforce AirTrunk's outstanding consent conditions — including outstanding noise verification reports and the Long Term Environmental Management Plan — as a precondition for further approvals in this precinct.
- Defer any determination until the NSW Parliamentary Inquiry into data centres has reported its findings.
- Require independent, real-time, publicly accessible noise and air quality monitoring as an enforceable condition of any consent granted.

Until these critical gaps are addressed with robust, independently verified safeguards and genuine community consultation, I strongly oppose the approval of Project Mars Data Centre at Lane Cove West.

Thank you for considering this submission.

Key References

1. Mytton, D. (2021). "Data centre water consumption." *npj Clean Water*. Nature Publishing Group. doi:10.1038/s41545-021-00101-w
2. World Health Organisation (2018). *Environmental Noise Guidelines for the European Region*. WHO/Europe, Copenhagen.
3. World Health Organisation. "Noise." *WHO Europe Fact Sheet*. who.int/europe/news-room/fact-sheets/item/noise
4. Nguyen, T.M. et al. (2006). "Proximity of the home to a cooling tower and risk of non-outbreak Legionnaires' disease." *Epidemiology and Infection*. PMC1676166.
5. CDC. "Controlling Legionella in Cooling Towers." *US Centers for Disease Control and Prevention*. cdc.gov
6. "The data heat island effect: quantifying the impact of AI data centers in a warming world." *ResearchGate* (2024). Reported: *Dezeen*, 9 April 2026.
7. MDPI Atmosphere (2022). *Data centre urban heat modelling study*. mdpi.com/2073-4433/13/5/714
8. Australian Energy Market Operator (July 2025). *Data Centre Energy Demand Final Report*. aemo.com.au
9. *In the Cove* (28 April 2026). "Government Regulators Drop the Ball as Data Centre Proposals Soar." *inthecove.com.au*
10. NSW Planning Portal. *SSD-9741 (AirTrunk SYD2), Mod-3 Assessment Report, June 2024*. planningportal.nsw.gov.au
11. FRNSW, letter from Senior Firefighter Michael Millar to Jeffrey Peng, NSW Planning, 11 July 2025.
12. NSW Greens (January 2026). "NSW Parliamentary Committee to Scrutinise Data Centre Boom in Nation-First Inquiry." *greens.org.au/nsw*

13. Lane Cove Council. "Data Centre proposed for 12 Mars Road Lane Cove." lanecove.nsw.gov.au
14. NSW Planning Portal. SSD-82052708 (Project Mars). planningportal.nsw.gov.au
15. Goodman Group SEARS Application. 12 Mars Road, Lane Cove West. March 2025.