

Nepean Blue Mountains Local Health District



27 May 2026

Mr Patrick Copas
Department of Planning, Housing and Infrastructure
Patrick.copas@planning.nsw.gov.au

Submitted via Major Projects Portal

SSD- 92743706: Environmental Impact Assessment (EIS) for the Mamre Road Data Centre Campus

Dear Mr Copas,

Thank you for the request to comment on the EIS for the Mamre Road Data Centre Precinct.

Nepean Blue Mountains Local Health District and the Ministry of Health (NSW Health) have reviewed the following documentation:

- Environmental Health Risk Assessment (EHRA) & Health Impact Assessment, prepared by E-LAB Consulting, dated 12 December 2025
- Water and Stormwater Management Plan, prepared by AT&L, dated 25 November 2025
- GHG Assessment Report, prepared by E-LAB Consulting, dated 4 December 2025
- Plant and Equipment Systems Report, prepared by Aurecon Australasia Pty Ltd, dated 12 December 2025
- Noise and Vibration Impact Assessment, prepared by Renzo Tonin & Associates, dated 12 December 2025
- Air Quality Impact Assessment – Main Report, prepared by Northstar Air Quality Pty Ltd, dated 11 December 2025
- Air Quality Impact Assessment – Appendices, prepared by Northstar Air Quality Pty Ltd, dated 3 December 2025
- Construction Air Quality Management Plan, prepared by Northstar Air Quality Pty Ltd, dated 11 December 2025
- Ecologically Sustainable Design (ESD) Report, prepared by E-LAB Consulting, dated 4 December 2025

NSW Health understands that the proposal for the Mamre Road Data Centre Precinct consists of:

- 1 GW data centre
- 726 cooling units (revised from 936 cooling units)
- 852 diesel back-up generators
- On-site storage of 18,056kL diesel fuel
- 6 buildings to be constructed in multiple stages over 10 years

The Mamre Road Data Centre Campus is of unprecedented size. The proposed site is located within close proximity to sensitive receptors including schools, aged care facilities, places of worship and residential developments. The data centre is proposed to operate 24 hours a day, 7 days a week and has the potential to cause adverse human health impacts as a result of the following areas:

- Noise and vibration
- Legionella risk

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- Water consumption and demand on drinking water supply
- Contaminated land
- Greenhouse Gas emissions
- Heat
- Air pollution

In particular, the Air Quality Impact Assessment (AQIA) identifies nitrogen dioxide (NO₂) and particulate matter (PM₁₀ particles less than 10 micrometres in diameter and PM_{2.5} particles less than 2.5 micrometres in diameter) as pollutants of health concern associated with the project. There is well-established evidence that even low-level and short-term exposures to these pollutants are associated with adverse health outcomes. In the absence of a clear safe threshold of exposure, a precautionary approach is warranted to minimise population exposure.

The AQIA predicts substantial increases in pollutant concentrations during construction and operational phases (maintenance testing and emergency), including exceedances of impact assessment criteria (IAC) or National Exposure Protection (Ambient Air Quality) Measure (NEPM) standards at sensitive receptors such as schools and residential areas, in some cases over extended durations. It has not been adequately demonstrated that these impacts will be effectively mitigated.

The AQIA may also underestimate impacts due to several methodological limitations. These include poorly justified assumptions in the dispersion modelling, the omission of diesel emissions from construction activities, and the lack of assessment of cumulative impacts from concurrent construction and operational phases. The assessment also does not consider a plausible worst-case emergency scenario involving an electricity outage upstream of the project's three feeders, which may pose greater health risks as it may be of a longer duration and associated cumulative emissions from simultaneous emergency operation of nearby data centres and elevated background pollutant levels from extreme weather events that may precipitate grid failure.

The Environmental Health Risk Assessment/Health Impact Assessment (EHRA/HIA) is also subject to limitations. It relies on a high-level qualitative approach, contains factual inconsistencies with the AQIA, and does not include a quantitative assessment of health risk despite this being warranted. In addition, there is insufficient evidence to demonstrate how proposed mitigation measures would reduce risks. As a result, the assessment does not adequately characterise potential health impacts or demonstrate that risks have been appropriately mitigated.

Please see **Appendix 1** for detailed feedback and recommendations on the above matters.

In summary, this development is likely to pose unacceptable risks for human health. The AQIA should be revised to address identified methodological issues, include all relevant emission sources and cumulative scenarios, and demonstrate through dispersion modelling that no residual exceedances of IAC remain following mitigation. The EHRA/HIA should be updated to correct errors and include a quantitative assessment of health risks in accordance with the enHealth Environmental Health Risk Assessment Guidelines (2012) or provide justification where this is not undertaken.

Given the scale of the predicted health risks and the methodological limitations identified, it is recommended that NSW DPHI consider engaging an independent expert to review the revised AQIA and EHRA/HIA. In addition, should the project be approved, NSW DPHI should consider requiring comprehensive and publicly available air quality monitoring during project construction and operation.

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For more information, please contact Thea Thomas, Deputy Director, Planning and Strategic Office at Nepean Blue Mountains Local Health District at thea.thomas@health.nsw.gov.au or on 0431 349 654.

Yours sincerely,

Paul Isaac
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Encl. Appendix 1. NBMLHD Feedback