

Mr Guy Smith
Head of Planning
Goodman Property Services (Aust) Pty Limited
1-11 Hayes Road
ROSEBERY NSW 2018

Attention: Ms Athena Vercoe, Assistant Development Manager

22 May 2026

Subject: Project Mars Data Centre, Lane Cove West – Additional matters for submissions report

Dear Mr Smith

I refer to the Department's previous correspondence dated 6 May 2026 which requested the provision of a submissions report in response to issues raised in public submissions and the advice provided by agencies.

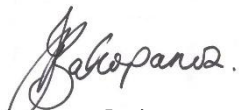
In addition to responding to the submission and advice already received, you are required to submit additional information that addresses the matters listed in **Attachment 1** of this letter.

You are requested to provide the information, or notification that the information will not be provided, to the Department by **Thursday 6 August 2026**. If you cannot meet this deadline or do not intend to provide a response, please advise the Department via the NSW planning portal.

Given the volume of community interest generated in relation to the development, the Department encourages you to undertake additional consultation with the local community during the preparation of the submissions report.

If you have any questions, please contact Patrick Copas on (02) 9274 6273 or via email at patrick.copas@planning.nsw.gov.au.

Yours sincerely,



Joanna Bakopanos

A/Director

Industry Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Based on the Department's review of the information provided in the Environmental Impact Statement (EIS), the Department considers further information is required to clarify matters and address inconsistencies within the documentation. In this regard, the following information is required to be provided as part of your submissions report:

Data centre operations

1. Based on the EIS, the Department understands that the back-up generators will be tested on a quarterly basis, for a maximum of 122.5 hours each year. However, it is unclear whether the EIS has fully considered all potential instances where the back-up generators are required to operate.

In this regard, please provide a clear description on how electricity supply and load would be managed during maintenance (planned and unplanned) or repair of:

- transmission provider (i.e. Ausgrid) assets,
- the on-site electrical infrastructure, including the proposed substation, and
- off-site electrical infrastructure.

Where you are proposing to rely on back-up generators for electricity supply during this maintenance work, clear justification for their use (including details on total number of generators and hours operated) must be provided.

2. In addition to the above, all warm-up and cool-down activities should be considered as 'operation' for the purposes of determining whether the development will exceed the 200-hour threshold stipulated under Schedule 1, clause 17(1A) of the *Protection of the Environment Operations Act 1997*.
3. The Department notes that the EIS and supporting technical assessments only consider the scheduled generator maintenance testing under standard operating scenarios in which the back-up diesel generators would be operated, as well as a 'worst case' power outage event.

The operation of the back-up power system has implications for the modelling of supporting technical assessments including air quality, operational noise and direct greenhouse gas emissions.

The Department requests that all relevant technical assessments must be updated to consider all operational scenarios of the back-up power system, to ensure likely impacts are accurately characterised and appropriately mitigated. This should include, but not be limited to:

- planned and unplanned maintenance events / repair events described in item 1 above, and
- system level testing.

Cumulative impacts

4. The Department notes the community has raised a number of concerns in relation to potential cumulative impacts with other data centre projects in the Lane Cove West Business Park.

Given the above, the development's noise and air quality assessments should be updated to align with the 'issue specific' cumulative impact assessment approach outlined in the *Cumulative Impact Assessment Guidelines for state significant Projects* (Department, 2026), particularly with regard to the development's typical 'day-to-day' operations and the development's realistic 'worst-case' scenario.

Where there is a likelihood of cumulative impacts occurring, potential mitigation measures should be identified and committed to, such as:

- incorporating adequate engineering controls to minimise site emissions
- coordinating testing times with other nearby data centres
- scheduling planning maintenance works in consultation with other nearby data centres or industries.

Please note that quantitative assessment methods should be relied upon in the first instance, with clear justification provided for the use of any qualitative assessment method/s.

Noise and vibration

5. The Department considers that further information is required to substantiate the conclusions of the operational noise assessment, particularly in relation to mechanical plant noise inputs, reliance on proprietary acoustic treatments with limited information, low-frequency noise predictions, and potential cumulative impacts. Accordingly, the submissions report must:
 - a) provide detailed technical documentation for Acoustic Package (AAL91033) for the air-cooled chillers, including independently verified test data supporting the adopted treated sound power levels across all relevant one-third octave bands
 - b) justify the adopted temperature and relative humidity inputs for plant sound power levels, demonstrating that these reflect realistic design or heatwave conditions for the locality
 - c) justify the selection of each monitoring site, including the methodology adopted, with reference to the definitions of 'residence(s)' and 'reasonably most-affected location(s)'
 - d) assess potential cumulative noise impacts at sensitive receivers within the Lane Cove West business park, including key public open space areas, Lane Cove West Public School, Arise Lane Cove apartments, and residences along Melba Drive, Penrose Street and Magdala Road
 - e) apply the method in Section 2.4.2 of the Noise Policy for Industry to derive project amenity noise levels for industrial clusters, using site area as a proportion of the business park in lieu of the number of developments in Equation 1
 - f) ensure the low-frequency noise assessment is project-specific and based on the combined operation of the proposed cooling towers and acoustically attenuated air-cooled chillers

- g) assess low-frequency noise impacts at all potentially affected receivers, accounting for contributions from existing and relevant future developments (refer to item 4 above), and evaluate the potential for sleep disturbance and associated health risks with reference to the WHO Guidelines for Community Noise and the *Noise Policy for Industry*
- h) demonstrate, using noise contours, that the most affected location has been identified within each noise catchment to verify the adequacy of low-frequency noise mitigation measures
- i) provide further justification around the assumed likelihood of simultaneous operation of all/multiple back-up generators, with regard to the circumstances in which their use would be required and the expected frequency of such events over the life of the development (see also item 3 above)
- j) undertake engagement with the adjoining occupant of 14 Mars Road to understand what impact, if any, the development is likely to have on its advanced manufacturing facility and/or commercial office space
- k) given the number of active recreation receivers located across NCA02 and NCA06, provide predicted operational noise levels for each receiver location (e.g. Blackman Park, Lane Cove West Tennis Club, the skatepark, the community nursery, etc)
- l) clarify the apparent discrepancy in predicted noise levels for receivers in NCA02, as it appears the predicted noise levels in this catchment are higher during standard operations (Scenario OP.01) than they are during the back-up generator testing scenario (Scenario OP.02).

Air quality

6. The Department notes that the Air Quality Impact Assessment (AQIA) does not appear to have considered a number of sensitive receptors located in close proximity to the site, including, but not limited to, the adjacent community nursery, the skatepark and the Lane Cove West Tennis Club. Please undertake further analysis of potential sensitive receptor locations in the surrounding area and update the AQIA to identify and assess the development's potential air quality impacts at these locations.
7. The Department notes that the AQIA relies on an assumption that the back-up generators will only operate under highly infrequent emergency conditions (based on data from a data centre in Eastern Creek), resulting in a negligible likelihood of nitrogen dioxide (NO₂) exceedances.

However, recent data from contemporary data centre projects indicate that the development's back-up generators may also be operated for planned and unplanned maintenance, testing, and other non-emergency scenarios.

Given the above, please update the AQIA to provide further justification around the assumed likelihood of simultaneous operation of all/multiple back-up generators, with regard to the circumstances in which their use would be required and the expected frequency of such events over the life of the development (see also item 3 above).

Where reliance is placed on data from other facilities, justification of its applicability to the proposed development should also be provided, having regard to scale, configuration, and operational practices.

Eastern interface

8. The Department acknowledges a number of public submissions have raised concerns in relation to the development's interface with the adjacent community nursery and nearby residences. Additionally, Lane Cove Council has also raised a number of concerns regarding the proposed Clause 4.6 variation to the 'Height of Buildings' control.

Given these concerns, strong consideration should be given to implementing additional design measures to the development's eastern façade, to help reduce the building's perceived bulk and scale and ensure there is no net loss to sunlight for those receivers to the east. In this regard, such measures could include additional façade treatments and/or building articulation or a reduction in building height and increased setbacks.

Greenhouse gas emissions

9. Given the volume of greenhouse gas emissions which would be generated over the life of the development, a Greenhouse Gas (GHG) Assessment must be provided that aligns with the relevant requirements of the *NSW guide for large emitters* (EPA, 2025), as per the advice provided by the NSW Environment Protection Authority.

The GHG Assessment must:

- ensure that emissions associated with IT equipment within the data centre (i.e. the IT load) are quantified / assessed
- identify emission reduction measures, which may include:
 - implementing energy efficiency practices
 - installing on-site renewable power generation systems
 - purchasing renewable energy certificates
 - entering into green power purchase agreements
- ensure that the assessment is verified by an independent expert review
- ensure that the overall structure of the assessment (including the emissions estimate tables) aligns with the structure outlined in appendices C and D of the guideline.

Ecologically sustainable development

10. The Department notes the development proposes to implement a number of technologies, including high-efficiency air and chilled water-cooling systems, to help reduce the development's overall power consumption.

However, the Ecologically Sustainable Development (ESD) report notes the development proposes a PUE of only 1.35 and a NABERS rating of below 5 stars. The ESD report should be updated to include an analysis of additional ESD measures (e.g. direct-to-chip cooling, mechanical system demand reduction/optimisation, workload management, etc) to further improve the energy efficiency of the development to a PUE of 1.3 or below and achieve a 5 star NABERS rating or better, to align with best practice.

11. The ESD report includes an option analysis for the development's cooling system which identifies marginal differences between Option 3 (air-cooled chillers with adiabatic assist) and Option 5 (a combination of air-cooled chillers and evaporative cooling towers).

While Option 5 was ultimately selected, the Department notes this option has a direct impact upon the development's overall Water Usage Effectiveness (WUE). Given the concerns raised by the local community in relation to water infrastructure impacts, please undertake further assessment of the Option 3 cooling system and provide additional justification for the preferred cooling strategy, with regard to the development's overall WUE and alignment with water conservation objectives.

12. The ESD report references renewable diesel, but it is unclear what specific type of renewable diesel is proposed and whether this will be trialled or form a formal commitment for proactive use following the commencement of operation.

In this regard, please clarify the type of renewable diesel product proposed to be used, the preferred generator model and the nature of the usage (e.g. trial basis, full implementation, etc).

13. A final NABERS Agreement to Rate for energy and water (and supporting documents) is required for commercial office space where the net lettable area is >1,000 square metres.

In this regard, please provide a final, signed NABERS Agreement to Rate as part of the submissions report.

Traffic and transport

14. The Department notes the community has raised a number of concerns in relation to construction traffic impacts, particularly in relation to the potential for construction worker light vehicles to adversely impact upon the availability of parking in nearby residential streets and at Blackman Park.

Given the above and noting the constrained nature of the site, the Preliminary Construction Traffic Management Plan (CTMP) should be updated to provide a comprehensive assessment of potential construction parking impacts, and a clear list of those management and mitigation measures which would be implemented to:

- prevent off-site parking impacts during all phases of construction (including ongoing fit-out following the commencement of initial operations)
- encourage construction workers to use alternative means of transport (e.g. public transport, shuttle buses, off-site private parking arrangements, etc) to access the site.

Management and mitigation measures

15. In light of the matters raised above, the Department requests that the list of management and mitigation measures provided in Appendix F of the EIS be updated to reflect any corresponding amendments to the technical reports, including any revised operational mitigation measures for noise emissions. The updated list of mitigation measures should be submitted in both Microsoft Word and PDF formats.