Mamre Road Data Centre Campus Submission

Introduction

I am writing to express my objection to the development of the Mamre Road Data Centre Campus for a variety of reasons as outlined below.

1. Poor public consultation for the social impact assessment

Page 41 of the Social Impact Assessment (listed as Appendix 30 on the NSW Planning website) provides a map of the area to which the 'newsletter' was sent out. Notably, this includes Kemps Creek, parts of Badgerys Creek, South Creek, and Mount Vernon. I have taken a screenshot of the map from page 41 to include in my submission to the left.

Page 42 of the same document goes on to say that **only 4 responses** were received while the survey was open.

The authors of the assessment themselves have stated here that it is not a *'statistically significant'* sample. I am inclined to agree with this because out of the population of the entire surveyed area, 4 responses is extremely small. While the information from these responses may have been helpful in outlining local concerns, it should have been a sign that greater public consultation and engagement was required before proceeding. Some further actions I believe would have been crucial include:

- consulting with residents in a wider radius of the proposed location
- encouraging council to send a letter to all residents in the area
- extending the survey period
- a second attempt at newsletter/email communication.

While this may have seemed costly in the short term, I believe that in the grand scheme of things, this would not have made a dent in the approximate $9B estimated cost of the project. In fact, residents of Penrith LGA like myself who live in one of the aforementioned suburbs, who were not in the surveyed area, were **never informed of this development** at all. The only way I found out was when I heard about a different data centre project and decided to do some research for myself.

The poor public survey and consultation makes it seem as though the development was going to go ahead despite what local residents may have thought, and that the survey was simply a formality to get out of the way. If the initial survey did not receive a sufficient number of responses, more action should have been taken to consult rather than proceeding to write a social impact assessment on such limited data. This is particularly concerning because of the nature of the proposed development: a data centre.

When it comes to factories or storage facilities being built on industrial land, residents are not always apprehensive. However, the rise of AI and machine learning has brought the concept of data centres to the front of many people's minds. We have all read articles or watched documentaries about the unliveable towns beside Meta's enormous data centres in the US. I think Australians, especially those who are going to be living in proximity to such a facility, have every right to be worried about how this resource-heavy facility will impact their own lives. The lack of global research into the long-term health and environmental impacts of hyperscale data centres is also a reason to take extra care with public consultation. To me, this means that even if normal protocols would say it is sufficient to only survey that small area, the developers and government, should go out of their way to inform residents in a wider radius because their lives may also be strongly impacted.

The Community Engagement Report (Appendix 32 at page 15) outlines that the stakeholders informed and consulted were actually just a small fraction of the LGA and I think this is an issue because the data centre is being treated just like any other development proposal on industrial land, when it is far from what we are used to.

It would be reckless to treat the construction of a data centre the same as one would a factory.

If it takes up so much more of our resources than a standard factory, then every other aspect of its development should also be scrutinised in proportion to this. **The environmental effects of the data centre won't stop at the blue line where consultation ended.** It will be felt throughout Penrith LGA, and likely further. If people living outside of the blue zone will be impacted, then they have a right to be proactively informed by the developers whose development will be impacting them – and if they don't know how far the impacts will reach, then that's a clear sign that they need to stop and find out before proceeding any further.

Therefore, the lack of appropriate consultation is a major concern of mine and I ask that the development be halted until a more comprehensive and widespread survey has been completed, with a larger sample of results.

2. Environmental Impacts

The environmental impact of data centres has been a contentious issue for the last few years, once again drawing to mind the image of American towns where people had to leave their homes because the only water coming out of the tap was a trickle of mud. From what I can understand, the NSW response to this is that data centres such as the proposed development will be drawing water and electricity from 'the grid', thereby preventing a repeat of the American situation in Australia. However, this is not exactly a comforting thought to me, as I'm sure it isn't for others as well.

Our 'grid' is already something we are very conscious of, seeing as though most people have observed the rise in energy prices in their bills over the last few years. It is unclear to me from the appendices how this 1GW+ data centre, drawing on electricity and water from our mains, will not contribute to the rise in energy consumption and thereby prices. Whilst this may not be a hyperlocal issue, the construction of such a facility will undoubtedly impact residents of NSW as a whole if energy providers decide to increase their prices. Coupled with

poor public consultation, a lack of a clear explanation of how such a drain on our natural resources will affect us only heightens apprehension and highlights why there needs to be a pause on this while more research is done.

Furthermore, the Greenhouse Gas Emissions Assessment (Appendix 32) provides more concerning data about how many tons of CO_2 are predicted to be produced by the facility. Below is a section from that assessment at page 24:

3.6 Emissions Estimates

3.6.1 Scope 1 and 2 Emissions

The following table describes the estimated emissions predicted for the data centre campus annually. It is important to note that these emissions have been identified for the peak Scope 1 and 2 emissions year. Peak is considered only for Scope 1 and 2 emissions as per the Large Emitters guide.

Table 12: Peak Scope 1 and 2 Emissions

Stage	Year	Scope 1 (t CO_2-e/year)	Scope 2 (t CO_2-e/year)	Total Scope 1+2 (t CO_2-e/year)
Operations – Maximum capacity	2032	998.8	1,699,710	**1,700,709**
Operation – Planned throughput	2032	998.8	1,296,029	**1,297,028**

In addition to peak emission estimation, projected emissions have been estimated for the data campus across a fixed time period. The following table describes the total estimated emissions for the data centre campus across 53 years of operation. This provides a wholistic view of GHG emissions from 2025 to 2080.

Table 13: Total Scope 1 and 2 Emissions (2025-2080)

Stage	Scope 1 (t CO_2-e)	Scope 2 (t CO_2-e)	Total Scope 1+2 (t CO_2-e)
Operations – Maximum capacity	79,091	27,785,264	**27,864,355**
Operation – Planned throughput	79,091	23,495,081	**23,574,172**

There are many concerning predictions outlined in this data, but the one that draws most of my attention is the **millions of tons** of CO_2 emissions projected to be released 'indirectly' (Scope 2) through 'purchased electricity from the grid during operations' (Appendix 32 at page 17). Even the most optimistic scenario involving renewable diesel fuel, found on page 32, projects upwards of **20 million tons** of CO_2 being released. The strategy to combat this is mitigation, and ultimately offsetting (page 38) by engaging with Australian Carbon Credit Units (ACCUs) which, to my understanding, involve supporting forest regeneration and the likes around Australia.

While this seems good and effective on the surface, especially because it sounds like it would be complying with Australia's goal of carbon neutrality, I think it is not enough to make up for the damage to the environment, and is essentially a 'bandaid solution'. This is because, in all likelihood, **the tons of carbon dioxide will be pumped out into the air we breathe every day, and the offsetting will take place somewhere far away**. Of course, I support the regeneration of our forests, but I don't think that allowing the data centre to offset its emissions this way is an acceptable solution or remedy to it pumping out countless pollutants which will end up in our lungs.

In addition, Appendix 16 provides the Air Quality Impact Assessment, which at page 5 outlines its mitigation strategies. These include 'water application, vehicle speed limits on site, careful handling of materials, an air quality monitoring program at sensitive receptors, and a Trigger Action Response Plan to guide real-time management and reduce potential off-site air quality impact'. While I do not claim to understand the statistics and calculations behind the data provided later on in the assessment, I can say that from an average local resident's perspective, these mitigation measures definitely don't mitigate the worries I have after seeing the **1 million + tons of CO_2 emissions projected by 2032**.

I don't think there has been enough research done into how we can properly nullify the negative environmental impacts of huge hyperscale data centres yet. Nor do I think we have the infrastructure capable of sustaining such a massive drain on our electrical grid and water mains yet. I say 'yet' because I do believe that someday we might be able to do this, but I don't think we're ready right now, and by jumping into something we're not fully prepared for, we would be condemning future generations, or even my own generation, to lasting environmental impacts that will deplete their quality of life.

Finally, I am aware that the Federal Government recently released their 5 expectations for data centres (available on the DISR website here), of which the third is to 'use water sustainably and responsibly'. Of the information I could see about how the proposed project is going to use freshwater for cooling, I am not satisfied that the practice is sustainable enough. Freshwater is already a dwindling natural resource and it is concerning that so much of it will be allocated to this facility when we have thousands of new homes on the way and a growing population we need to sustain.

For these above reasons I believe that the Mamre Road Data Centre Campus is not sufficiently environmentally friendly to keep local residents' health entirely safe from rapid, large-scale air pollution. I also have concerns about its use of natural resources and how this can impact energy and water prices, and how the project complies with the Federal Government's expectations. I think the project needs to be paused until more research is conducted into the environmental and long-term health impacts of data centres.

3. **The number of data centres already in the area**

My third reason for opposing this development is because there are already many data centres functioning or being constructed in the Penrith LGA, and Western Sydney as a whole. In fact, the only reason I learnt about this development was because I was researching a Microsoft data centre at 769 Mamre Road.

What is extremely concerning is that within a 15 minute drive from my house, there are 2 proposed data centres on Mamre Road, 1 in Erskine Park (450MW), and 1 in Horsley Park. These are 4 massive facilities so close to where I live. There are more in Eastern Creek, Seven Hills, Bella Vista, Marsden Park, Lane Cove, and probably even more that I haven't heard of yet.

Consider the environmental factors and concerns I outlined above, for this single project – and then extend that to all the others I've listen in such a small amount of space. The strain this will place on our resources is beyond immense.

I object to this development because it is the largest of these data centres as far as I'm aware, and because I was not notified of any of these developments despite living so close, and have now missed the submission dates for most of them.

Conclusion

I believe that by approving this development, the government would be performing a great disservice towards Western Sydney. Western Sydney residents already exist in a space of constant development and innovation. While we love to see new things, everything must be done in balance. It is unfair to us, the people who call this area their home, if data centres and the companies that own them are suddenly allowed to pollute the air that we breathe.

Planting trees in a forest hundreds of kilometres away will not truly 'offset' the damage done to our lungs.

I ask that this project be halted, and that widespread communication be sent out to all residents in the LGA, because we all breathe this air, and we all deserve to know what is happening around us. Beyond that, the government's first duty is to its people, and this would include proper education and consultation with *everyone* affected, because in 2032, if we realise that the amount of greenhouse gases we released have done something irreversible to our environment, it would be too late for all the research and preparation we should be doing now.