

22 April 2026
Lane Cove West, NSW 2066

NSW Department of Planning, Housing and Infrastructure

Attention: Patrick Copas, Planner

Phone: 02 9274 6273

Submitted via NSW Planning Portal

Re: Objection to State Significant Development Application -- Project Mars Data Centre

Application No: SSD-82052708 | Applicant: Goodman | Site: 12 Mars Road, Lane Cove West NSW 2066

I am a resident of Lane Cove West, living approximately 500 metres from the proposed development at 12 Mars Road. My children attend Lane Cove West Public School, which sits approximately 160 metres to the north-east of the site. I am writing to formally object to this application and to ask that the Department give careful weight to the concerns set out below before any determination is made.

I accept that digital infrastructure has a role in the national economy and that data centres need to be located somewhere. What I do not accept is that this site is an appropriate location for a facility of this scale and character. The site sits on the edge of a low-density residential zone, directly adjacent to a public primary school, and is already subject to cumulative industrial impacts from two other data centre facilities operating within 600 metres.

The proposed development is a 90 megawatt facility operating 24 hours a day, seven days a week. The noise, air quality, water consumption, thermal, and power grid impacts of a facility this size are significant and ongoing. When assessed together with the approved AirTrunk SYD1 and SYD2 facilities already in or entering operation nearby, the cumulative effect on this community has not been adequately examined.

My objection covers four areas: noise; air pollution from diesel generators; water consumption and infrastructure; and heat generation. I also raise the failure to properly assess cumulative impacts across the precinct.

Ground 1: Noise Impacts on Residents and Sensitive Receptors

1.1 Proximity and Applicable Standards

The closest residential properties are 50 metres east of the site boundary. Lane Cove West Public School, with approximately 589 students in Kindergarten to Year 6, is approximately 160 metres to the north-east. Both are sensitive receptors that warrant careful assessment under the NSW EPA Noise Policy for Industry (2017) (the NPI).

The NPI requires noise from industrial developments to be assessed against rating background levels specific to each location, with separate sleep disturbance criteria

applying at night. In areas without significant existing industrial background noise -- which describes the low-density R2 zone immediately adjacent to this site -- those baseline levels will be low. Approval conditions must reflect the quiet ambient character of the residential area, not the noisier conditions inside the business park.

1.2 Cooling System Noise

Hyperscale data centres of this type generate persistent noise from large cooling systems running continuously. The applicant proposes adiabatic cooling, which reduces water consumption compared to open evaporative cooling but produces higher noise and energy consumption. The EIS indicates daytime noise of up to 51 dB(A) and night-time noise of 35 to 38 dB(A) at nearby residential receivers.

The World Health Organisation recommends bedroom noise levels below 30 dB(A) at night for adequate sleep. The proposed night-time levels at nearby homes sit 5 to 8 decibels above that threshold. On the logarithmic decibel scale, a 5 dB increase represents roughly a doubling in perceived loudness.

What matters here is not just the overall level but the character of the noise. Low-frequency tonal noise from cooling plant travels further, penetrates building fabric more effectively, and is poorly captured by standard A-weighted assessments. Research consistently finds that tonal low-frequency noise generates elevated community annoyance even where measured decibel levels appear compliant. I ask that the noise modelling in the EIS be independently audited for its treatment of low-frequency and tonal components, and that any approval conditions include specific low-frequency criteria.

This is not theoretical. Residents of the apartment block at 150 Epping Road already report hearing persistent noise from the existing AirTrunk facility. Local MP Anthony Roberts has noted that the Great North Walk nearby, which was previously quiet bushland, is now subject to constant humming from cooling systems. These are real-world outcomes from facilities already operating in this precinct, and they confirm that modelling alone is not enough.

1.3 Diesel Generator Noise

The facility will include multiple diesel backup generators on the rooftop behind acoustic screens. Lane Cove West has an established history of power outages, making emergency generator activation a realistic recurring event rather than a theoretical one. Generator noise during testing and emergency use represents a material additional impact on nearby homes and the school.

I request that the Department impose conditions covering: (a) the number of generators, which the EIS leaves unspecified; (b) maximum allowable noise during testing; (c) restriction of testing to specific daytime hours; and (d) independent post-commissioning noise monitoring with public reporting obligations.

1.4 Impact on the School

Lane Cove West Public School is a noise-sensitive educational facility serving close to 600 students. The NPI recognises educational facilities as sensitive receivers. A school 160 metres from a continuously operating 90MW industrial facility demands specific assessment of daytime noise impacts during school hours. The available

EIS materials do not satisfy me that this has been adequately addressed. Any approval conditions should include noise limits measured at the school boundary, not just at the nearest residential receivers.

Ground 2: Air Pollution from Diesel Backup Generators

2.1 Emissions and Health Risk

Diesel generators emit fine particulate matter (PM_{2.5}), nitrogen oxides (NO_x), volatile organic compounds and carbon monoxide. PM_{2.5} is classified by the International Agency for Research on Cancer as a Group 1 carcinogen. NO_x contributes to ozone formation and respiratory inflammation. These health risks fall hardest on people with developing respiratory systems, including children.

Rooftop diesel generators sitting 160 metres from a primary school create a direct risk of localised air pollution during operation. Even if individual testing events are short, the cumulative exposure over a school year is not trivial, particularly given that the two AirTrunk facilities nearby are reported to have a combined total of 150 backup generators.

2.2 Regulatory Gap for Stationary Diesel Generators

Australia currently has no binding regulations controlling emissions from non-road diesel engines, a category that includes stationary backup generators. The federal Department of Climate Change, Energy, the Environment and Water has assessed non-road diesel engines as the largest source of unregulated air pollution in the country, with total particulate emissions exceeding those of all on-road motor vehicles combined despite representing only 3% of engine numbers.

This regulatory gap means that health impacts from generator emissions at this facility may fall on neighbouring residents and schoolchildren without any compliance backstop. In the absence of national standards, the Department should impose conditions requiring: (a) diesel particulate filters and selective catalytic reduction on all generators; (b) a commitment to low-emission alternative fuels such as hydrotreated vegetable oil; and (c) real-time emissions monitoring with community reporting.

2.3 Cumulative Air Quality

The combined generator exhaust from this facility and the two AirTrunk centres has not, to my knowledge, been assessed as a cumulative air quality impact. I request that a precinct-wide air quality assessment be required before any determination, covering all operational generators across the three facilities.

Ground 3: Water Consumption and Infrastructure

3.1 Scale of Consumption

The proposed facility is reported to consume an average of 1,405 kilolitres of water per day. Combined with Goodman's approved Artarmon facility at approximately 2,300 kL per day, Goodman's two Sydney facilities alone would consume roughly the daily equivalent of 6,000 Sydney households. Sydney Water has projected that data

centres across Sydney could collectively consume up to 25% of the city's drinking water supply by 2035.

The infrastructure burden of earlier data centre approvals is already being felt by residents of this suburb. Lane Cove West has experienced more than a year of disruptive roadworks by Interflow on behalf of Sydney Water, installing additional water supply capacity specifically for the AirTrunk facilities. This is not a future concern -- it is already the lived experience of people in this community.

3.2 Recycled Water -- An Unfulfilled Commitment

The applicant commits to using recycled water for cooling. That commitment cannot currently be honoured. Recycled water infrastructure for the Lane Cove precinct does not exist and has no confirmed delivery timeline. IPART's 2025-30 pricing assessment for Sydney Water found that Sydney Water only raised data centre water infrastructure concerns in September 2025, despite years of approvals being granted on the basis that recycled water would be available.

A commitment that cannot be operationalised from the first day of operation should not be accepted as a mitigating factor. Any approval should require a binding plan with specific milestones for transitioning to recycled water supply, with costs borne by the operator rather than Sydney Water's broader customer base.

3.3 Drought Planning

NSW Planning does not require data centres to demonstrate drought contingency plans, leaving that to operators and Sydney Water. Sydney Water has stated it will prioritise drinking and public health uses in drought conditions and will not guarantee data centre supply. The applicant's provision -- 24-hour internal storage tanks and rainwater collection usable for irrigation but not cooling -- falls well short of what is needed for a facility consuming over 1,400 kilolitres per day.

A mandatory drought management plan, specifying binding reduction targets, alternative supply options, and reduced-operation protocols during water restrictions, should be a condition of any determination.

Ground 4: Heat Generation and Urban Heat

A 90MW data centre dissipates substantial waste heat into its surroundings. NSW Planning's own urban heat framework acknowledges that developed areas already run materially hotter than surrounding natural areas. The Greater Sydney Heat Taskforce and the NSW Climate Change Adaptation Action Plan 2025-2029 identify heatwaves as a growing and serious risk to community health.

Three hyperscale data centres discharging waste heat in a single contained precinct represents a localised heat source with real consequences, particularly for a primary school with outdoor play areas and for the residential zone to the east. The Western Sydney Regional Organisation of Councils has warned that cumulative thermal impacts from data centre clusters are being underestimated when facilities are assessed one at a time.

I request that the Department require the applicant to model the thermal output of the proposed facility in combination with the existing AirTrunk facilities, demonstrate

measures to reduce waste heat discharge, and include the school grounds and nearest residential receivers in any thermal impact assessment.

Ground 5: Cumulative Impact Assessment

This application must not be assessed in isolation. Within roughly 600 metres in the Lane Cove West Business Park, there is one operating data centre (AirTrunk SYD2 at 1 Sirius Road), one approved facility under construction (AirTrunk SYD1 at Apollo Place), and this proposed facility. Further applications for additional data centres in the same precinct have been reported as in planning stages.

Every impact discussed in this submission compounds across facilities: noise from multiple cooling systems and generator banks adds acoustically; generator exhaust plumes overlap; water demand draws on the same infrastructure; waste heat concentrates in the same precinct; and combined grid load from a single network node increases the risk of simultaneous generator activation during outages.

Lane Cove Council has already noted reports of brownouts and supply fluctuations in Lane Cove West since data centre expansion began. The Committee for Sydney has observed that NSW lacks any overarching spatial strategy for data centre deployment. In the absence of that strategy, assessing each application on its own terms is not adequate protection for communities bearing the cumulative effects.

Requests

I ask that the Department:

- Refuse the application in its current form, given the inadequacy of cumulative impact assessment and the proximity of the school and residential zone;
- Alternatively, if the application proceeds, require a comprehensive and independently reviewed cumulative environmental impact assessment covering noise, air quality, water, heat, and power infrastructure impacts across all three facilities in the precinct;
- Impose specific, measurable, and independently monitored noise conditions protecting the residential zone and the school, including site-specific low-frequency noise limits;
- Require full specification of diesel generators before determination and impose binding emission control technology requirements;
- Require a binding, time-bound recycled water transition plan and a mandatory drought management plan;
- Commission or require independent thermal impact modelling for the precinct as a whole; and
- Ensure this objection and the issues it raises are formally referred to the NSW Parliamentary Inquiry into Data Centres' Rapid Expansion, currently underway.

I am a resident of this community, a ratepayer, and a parent of children who go to school 160 metres from this proposed facility. The effects of data centre

development in this precinct are not abstract -- they are already part of daily life here. I am asking the Department to take these concerns seriously and to ensure that the economic interests of a major developer do not override the health, amenity, and safety of the families who live and go to school nearby.

I am available to be contacted in relation to this submission.

Yours faithfully,

[Name withheld for privacy]
Lane Cove West NSW 2066