

Submission in respect of proposed data centre at 12 Mars Road (Project Mars Data Centre, Lane Cove West SSD-82052708).

I am a resident of Lane Cove West and live at Banksia Close. I am writing this submission because I understand that there is currently a proposal by Goodman Property Services (Aust.) Pty Ltd (**Goodman**) to build a large data centre at 12 Mars Road, Lane Cove West (**Project Mars DC**). Project Mars DC, if approved, will be in very close proximity to my home (approximately 110 metre) and I have significant concerns with the proposal and wish to object to it.

Contextual background matters

I want to preface this submission with an acknowledgement that data centres are a necessary part of our modern life. We have an ever-increasing demand for data and data centres are necessary to facilitate and sustain that demand. However, I am concerned that the proliferation of data centres in our state has not been subject to the levels of regulatory oversight which they demand, particularly in the approval/planning phase, when there is a clear opportunity to think critically and strategically about a range of matters including, but not limited to, how many data centres NSW should commit to approving, where they should be located, how they will impact on existing infrastructure¹ (including in respect to our desire to focus on renewable energy), what long term benefits they will provide (including for example, for our economy), and whether there are any particular policy/regulatory measures which should be implemented to ensure that they do not cause any foreseeable negative impacts (including for example, health impacts) for the local communities in which they operate.

It is apparent that the Government has a mandate to build data centres in NSW. So much is clear from various ministerial media releases published in recent months.² What is less clear however is how that mandate is going to be implemented and how stringent the approval process for data centres is going to be, particularly in circumstances where the Government is investing billions into the development of data centres, and is seeking to accelerate construction through the State Significant Development (**SSD**) framework.

I otherwise understand that the Government has supported 15 projects by the Investment Delivery Authority,³ including one listed as being at 16-20 Mars Road, Lane Cove West. If that project does progress and Project Mars DC is also approved, there will be a significant cluster of data centres in Lane Cove West Business Park (with five data centres in total).

Despite the steady rate of approvals of data centres in NSW, there also appears to be concern about their proliferation (including adverse health impacts amongst other things).⁴ I am aware that there is currently a parliamentary inquiry into the development and regulation of data centres in NSW (**Inquiry**). That Inquiry is considering a broad range of matters, including relevantly, the impact of data centres on surrounding communities (including noise, air quality,

¹ Including power and water, noting that by 2030, data centers are expected to consume 11% of our state's electricity.

² See for example – 'NSW Government backs data centre investment, sets course for sustainable development', published 27 March 2026: [NSW Government backs data centre investment, sets course for sustainable development | NSW Government](#).

³ Ibid.

⁴ See for example the submission of Environmental Health Australia (NSW) Inc to the Inquiry (Submission 19): [0019 Environmental Health Australia \(NSW\) INC.pdf](#). See also the submission of the Centre for Safe Air (Submission 108) to the Inquiry: [0108 Centre for Safe Air.pdf](#).

heat, traffic and land-use conflicts).⁵ The Inquiry is ongoing and a report in respect of that Inquiry is not due until 30 September 2026.

Further, the NSW Government itself appears to be considering relevant guiding principles for approval of data centres in NSW. I am aware that Infrastructure NSW has recently released a NSW Data Centre Consultation Paper (**Paper**) which '*sets out a principles-based approach to engage with industry on the opportunities and challenges of data centre investment growth.*' The Paper makes reference to five principles in the approach to data centre investment in NSW, with feedback being sought from industry, community and sector stakeholders. The Paper notes that '*Feedback will help design a transparent framework that provides clear assessment measures around data centre investment and managing risks for the community.*' Consultation on the Paper concludes on 8 May 2026.

Whilst both the Inquiry referred to above and the Paper demonstrate that important work is being undertaken, these initiatives also demonstrate that our approach to the construction of data centres has not been entirely informed by critical and fulsome analysis of their impact (broadly defined), and that our approach in meeting the demand for this infrastructure has been both hasty⁶ and reactive.

Given the significance of the questions which are presently being investigated in the context of the above, it makes immeasurable sense to consider the outcomes of both the Inquiry and consultation in respect of the matters identified in the Paper before significant resources are utilised to build more data centres (like to one proposed at 12 Mars Road), particularly in densely populated urban areas like Lane Cove.

Project Mars DC Concerns

Site location

I have carefully considered the Environment Impact Statement (**EIS**) for Project Mars DC, and note that what is proposed is a massive structure (approximately 21,832m² in size), which, whilst part of an industrial park, is, on its own assessment, in very close proximity to "Sensitive Receivers"⁷. In particular, the site will be in very close proximity to:

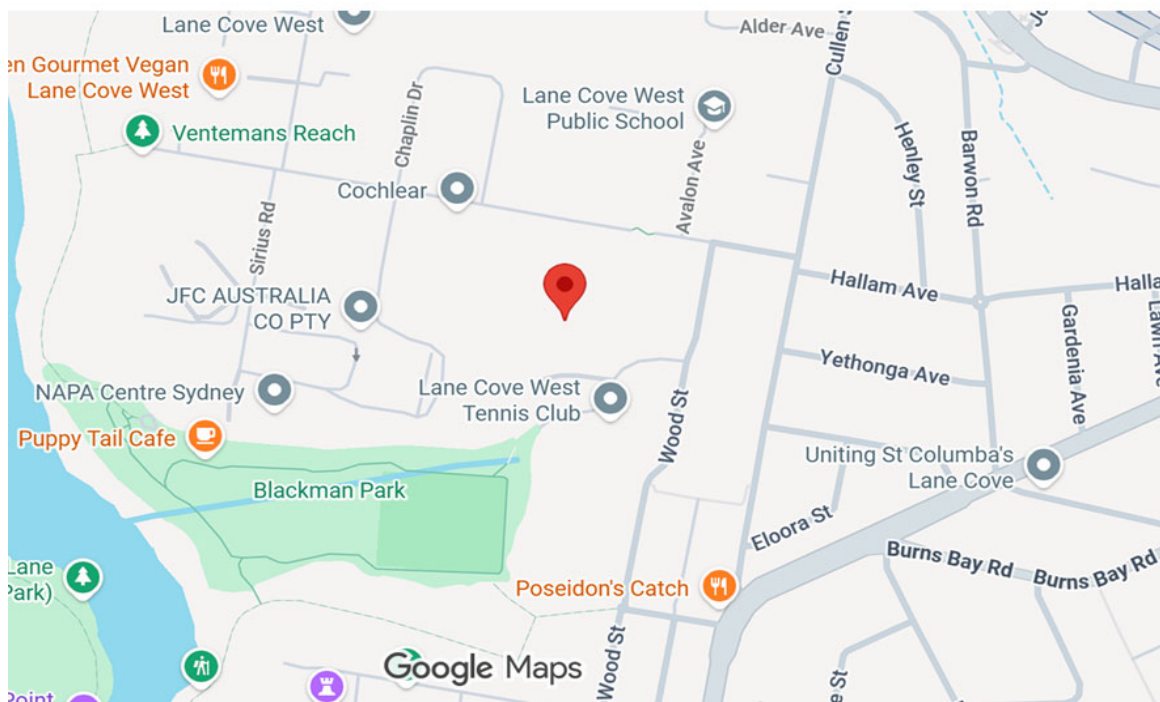
- (a) Residential homes (approximately 50 metres from the nearest home and 110 metres from my property);
- (b) Lane Cove West Public School (approximately 160 metres);
- (c) Blackman Park, being a park used by many local residents (and principally children) for various sports, including soccer, AFL and basketball;
- (d) Tennis Courts;
- (e) Lane Cove Bush Care Community Nursery; and
- (f) A children centre which is located within the industrial estate

⁵ 'Wide-ranging inquiry into data centers in NSW covers energy/water needs and much more', Clayton Utz, February 2026 Insights: [Wide-ranging inquiry into data centres in NSW cove... | Clayton Utz](#)

⁶ The Paper notes (at page 3) that 'NSW is amongst the most active jurisdictions for data centers **globally**, with 90 data centers currently operating.' (Emphasis added).

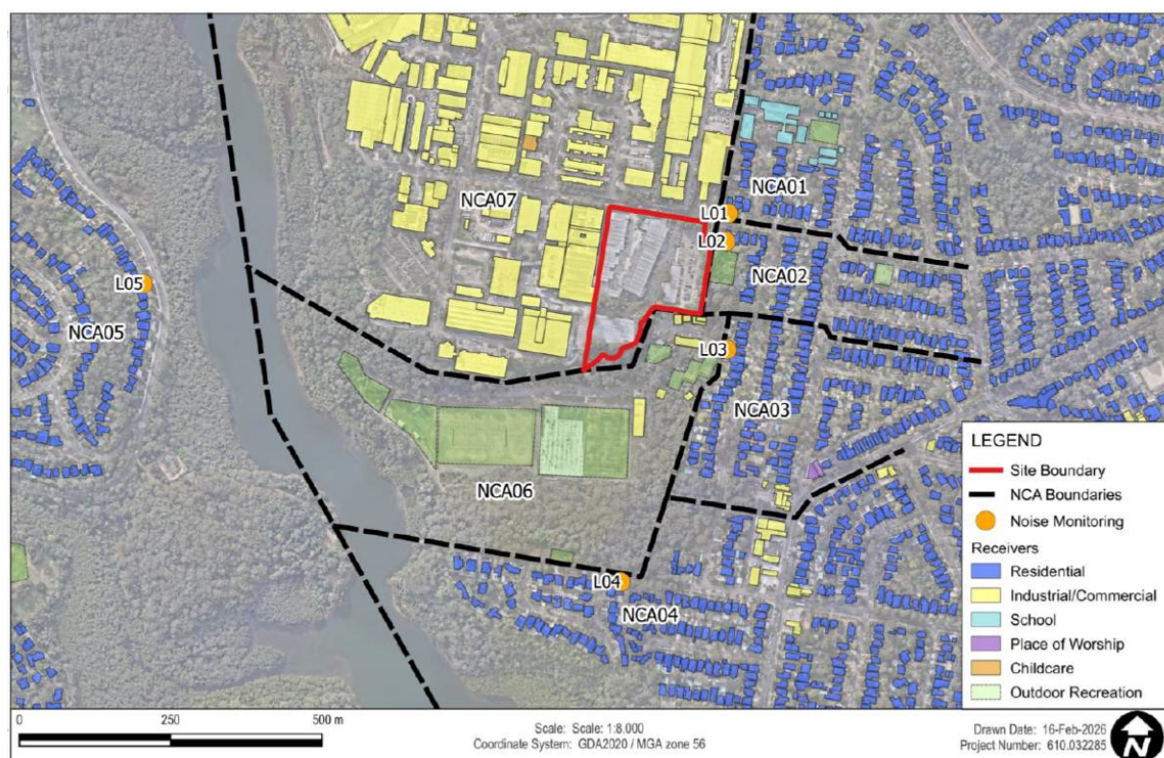
⁷ See page 18 of the EIS where residential properties, Lane Cove West Public School and Blackman Park have all been identified as 'Sensitive Receivers'.

I note that the aerial photograph at Figure 1 on page 6 of the EIS identifying the proposed site fails to provide a true visual representation of its location (particularly in respect to (b), (c) and (d) above). A more accurate reflection of the location is included below:



A further, more accurate reflection of the location as against surrounding 'sensitive receivers' is located at Figure 41 (on page 104 of the EIS):

Figure 41 Surrounding **sensitive receivers** and noise monitoring locations



Source: SLR, 2026

The close proximity to homes and our local public school raise significant concerns, particularly in light of the noise and air quality concerns I discuss below and in circumstances where I have three small children (aged 9, 5 and 2), two of whom attend Lane Cove West Public School, with my youngest to follow in due course.

I otherwise dispute the matters raised at page 8 (and elsewhere) in the EIS regarding the site suitability for the project, because:

- (a) Whilst it is true that 12 Mars Road is zoned as general industrial, the proposed location of the site borders residential homes on its eastern boundary;
- (b) There are already a number of other data centres (existing or proposed in this industrial park), the construction of which have caused extensive, prolonged and disruptive construction which has been required to get access to water supply for the Apollo Place Data Centre. This work commenced in November 2024 and is ongoing. Given the extended construction work that has been necessary to facilitate water supply to the Apollo Place Data Centre, it is open to suggest that adding a further data centre(s) to this industrial park will only compound issues with water, and does not otherwise address concerns which already exist about energy supply (in circumstances where power outages are not infrequent in Lane Cove);
- (c) Despite the assertions made about the project being in the public interest (including will a proposal to provide 26 jobs during the operation of the development) there is a compelling argument that the development is not in the public interest, and certainly not in the interests of local residents (including many young children who attend Lane Cove West Public School) who will need to contend with years of construction, and the effects of noise and air pollution. Indeed, the EIS has itself identified⁸ (in its cited Social Impact Assessment) that ***'it was found that there would be low positive impact to the way of life of Lane Cove's local community'*** (Emphasis added).

Question: As noted above, the EIS has identified Sensitive Receivers near the proposed development site.⁹ At page 22, it states that *'a well-established industrial area means that sensitive receivers and non-compatible land uses are located at a distance and are adequately separated or screened from the site'*. It is not apparent from the EIS how:

- (a) Sensitive Receives are 'located at a distance' given the proposed location of the site; and
- (b) What 'screening' exists for the Sensitive Receivers.

Proposed height of structure

The EIS includes a request to increase the height of the structure by almost 60% (from the allowed 18 metres to 28.3 metres). From what I can see, the main reason given is to meet commercial "hyperscale" operator requirements. I am mindful that Lane Cove Council has already covered this issue in detail in its submission, and I support the points Lane Cove Council has made about the proposed height of the structure.

⁸ At page 122 of the EIS

⁹ At page 18 of the EIS.

Noise considerations

The noise assessment in the EIS is not persuasive (and in my view, likely to be inaccurate). I believe that the proposed data centre is likely to result in an unacceptable level of operational noise for nearby residences, particularly given that it will operate on a 24/7 basis, and otherwise through the construction phase, during which the EIS concedes that *'noise levels at the nearest residential receivers in NCA01 to NCA03 are predicted to exceed the Highly Noise Affected NML when the noisiest equipment is working close to these receivers.'*¹⁰

The EIS relies on the NSW Noise Policy for Industry, which sets benchmarks intended to protect residents from loss of amenity due to industrial noise. In the noise report, the applicable limit is modelled at **36 dBA**.

The EIS then states that the data centre's operational noise will be at the same level (36 dBA) and concludes that this outcome would be acceptable.

However, the report also acknowledges that several key inputs used for the modelling are estimates at this stage (for example, the type and number of units, equipment locations, and sound power levels). It states that these details will need to be revisited during detailed design, through further acoustic assessment, to confirm compliance with the applicable noise limits, and that compliance is expected to be achieved through equipment selection and noise-control measures.

Accordingly, the EIS does not confirm the final plant and equipment to be installed, nor the operational noise levels that will result. In those circumstances, the noise modelling should not be regarded as sufficiently reliable to support the grant of development consent.

In response to the EIS, my husband undertook some noise monitoring by walking up to the AirTrunk Data Centre at Apollo Place (also located in the Lane Cove Business Park) and measuring the relevant level of noise with a NATA-calibrated device. Given that AirTrunk DC is of a similar scale, is recently constructed, and is located within the same precinct, it is reasonable to treat its operational sound output as a useful comparator.

At a distance of approximately 110 metres from AirTrunk DC (being similar to the distance between our home and the proposed development), the operational noise was clearly audible and continuous. It comprised a persistent low-frequency hum consistent with fan operation, together with intermittent hissing and pneumatic-type noise. The monitor recorded an LAeq of 53.6 dBA and an LAFmin of 47.9 dBA.

On this basis, we consider these readings to be indicative of operational conditions and note that they materially exceed the proposed trigger level of 36 dBA and cause an unacceptable loss of amenity for local residents.

Questions:

- (a) Can it be guaranteed that the level of noise from the proposed data centre will not exceed the benchmarks set by the NSW Noise Policy for Industry?
- (b) What compliance/reporting steps would the data centre need to have regard to following construction to ensure that the assurances/views expressed in the EIS are reflective of what occurs in practice?

¹⁰ At page 97 of the EIS.

- (c) What commitments will be made by Goodman and the regulator that actions will be taken if monitoring during the operational phase identifies an exceedance of the expected levels?

Air quality considerations

As noted above, I live approximately 110 metres from the proposed site, and two of my children attend Lane Cove West Public School. All of us frequent Blackman Park multiple times a week and often for extended periods (particularly during soccer and AFL games my kids play, along with their training sessions).

I am deeply concerned by the prospect of living next to a facility which is intended to have 49 diesel generators, over 1 million litres of diesel storage, 194,000 kg of lithium-ion batteries and 68,000 litres of transformer oil so close to my home, and the residential homes around me (not to mention the school and park areas), and how air quality may be affected by the diesel generators.

The EIS includes an assessment of air quality during the operational phase, and notes as follows:

*Every standby generator will be tested every quarter of the year (Q1, Q2, Q3, and Q4). Only one generator will be tested at any one time, and all generator testing will be conducted between 07:00 am and 5:00 pm, Monday to Friday. For Q1, Q2 and Q3 every generator set will operate for 40 minutes (inclusive of 10 minutes of cooldown after testing). This equates to a total of 5,880 minutes of generator operation time for Q1, Q2 and Q3 combined. For Q4, every generator will operate for 70 minutes (inclusive of 10 minutes of cooldown after testing) which equates to 3,430 minutes of generator operation. **The total annual generator operating hours over the year due to generator testing is estimated to be 9,310 min or 155.2 hours.**¹¹ [Emphasis added]*

The above assessment does not account for when diesel generators are utilised in emergency operations. I note that in assessing necessity to use back-up generators, the EIS has assessed a similar facility in Eastern Creek. Whilst the facility itself may have been similar, I am aware, as a resident of Lane Cove for almost 10 years that power outages are not uncommon in our area and I have significant concern about the accuracy of the assessment made in the EIS about the impacts upon human health from the use of diesel generators.

I note for completeness that the Paper makes reference to a need, in considering proposals for data centres, to have regarding to environmental matters, including diesel generator impacts and sensitive sites. Specifically, the Paper notes:

*“Data centres use diesel generators as critical backup power supply. This means they are used for a limited number of hours throughout the year, primarily for testing. Data centre operations state that generator operation is not discretionary. It is required to maintain load stability and system security when the grid is under stress to ensure critical workloads like flight control, banking, government service, health and transport systems do not encounter outages. **Regular operation of backup diesel generators is also required to confirm operability. However, diesel engine exhaust contains***

¹¹ At page 91 of the EIS.

high levels of pollutants, including fine particulate matter (PM2.5) and nitrogen oxides (NOx), which are linked to adverse health outcomes...Other impacts requiring further investigation include management of data centre clustering near sensitive sites (eg residential areas or schools)..." [Emphasis added]

The adverse consequences of 'clustering' is also apparent in the EIS, including in Table 22¹² which addresses the cumulative impact assessment. Relevantly, this table makes reference to the Airtrunk Syd2 data centre (located 500m from the site) and the Apollo Place Data Centre (an approved data centre located 400m from the site) and notes that there is potential for cumulative impacts between the data centres and that *'the project may result in significant cumulative air quality impacts under emergency conditions'*.

I otherwise refer to a compelling submission made by the Centre for Safe Air to the Inquiry¹³ which notes in part:

"Diesel emissions include several harmful pollutants including fine particulates smaller than 10 microns in diameter (PM10 and PM2.5), carbon monoxide (CO), nitrogen dioxide (NOx) and sulphur dioxide (SO2). Long-term exposure to air pollution from diesel combustion is associated with higher rates of cardiovascular disease, respiratory disease and cancer. Exposure to PM2.5 may affect fertility, reproduction, and cognition. These health impacts disproportionately affect the most vulnerable in society including children, pregnant people and unborn babies, older adults, individuals with pre-existing chronic conditions, Aboriginal and Torres Strait Islander peoples and socially disadvantaged populations. Moreover, there is no 'safe' level of exposure to diesel emissions, with measurable health impacts even at extremely low levels.

In Australia, backup diesel generators are classified as non-road diesel engines. A report commissioned by the Department of Climate Change, Energy, the Environment and Water found that PM2.5 and NOx emissions from non-road diesel engines in Australia—including backup generators for data centres—had a health impact equivalent to 5,387 years of life lost in 2018 alone.⁶ The authors found that this health burden would equate to an annual cost to society of \$1.6 billion.⁶ Despite these findings, the Australian Government has not moved to regulate emissions from non-road diesel engines, which leaves backup diesel generators as one of Australia's most significant unregulated sources of harmful air pollution."¹⁴

In the face of the available information, including considerations raised in the Paper, submissions made for the purposes of the Inquiry, and the matters identified in the EIS regarding potential impact on air quality, it is unconscionable to proceed with approval of a site which is in such close proximity to "Sensitive Receivers". This is our time to take pause and ensure that what is being proposed is not going to impact the health and wellbeing of our children and grandchildren for decades to come.

Question: If the air quality modelled in the EIS proves to be inaccurate and/or there are more emergency situations than have been forecast, what reasonable steps will be made by Project Mars DC to mitigate the impact on the local community?

¹² At page 93 of the EIS

¹³ Submission of the Centre for Safe Air (Submission 108) to the Inquiry: [0108 Centre for Safe Air.pdf](#).

¹⁴ Ibid at page 2.

Question: Are there specific monitoring/compliance measures and enforceable air quality safeguards with which the site will need to comply? What are they? What are the consequences if there is a failure to comply with those requirements? If there are no enforceable safe guards, why not?

Question: In circumstances where Australia lacks an emissions standard for non-road diesel engines, what steps will be taken to ensure that the diesel backup generator emissions will not adversely affect the local community and adversely impact on air quality? For instance, can it be confirmed whether it is intended that:

- (a) Advanced after-treatment technologies such as diesel particulate filters and selective catalytic reduction will be employed to reduce emissions of PM2.5 and NOx?
- (b) Whether the site is going to be required to adopt a hybrid battery-diesel system for generator testing?
- (c) Prior to the approval for the Project Mars DC, will Goodman be required to undertake an analysis of other best practice strategies (based on adopted models to reduce emissions in other international jurisdictions) and their feasibility for this site? If not, why not?

Question: Whilst the EIS has not disclosed specific requirements for water and energy at this stage, it is assumed that Project Mars DC will be operated through NSW's grid supplied energy. How does this align with the intention of the Government to have data centres use renewable energy? Further, what steps are being taken by Project Mars DC to address existing concern about blackouts in the Lane Cove area, given its likely significant drain on power supply?

Construction phase considerations

Page 123 of the EIS states in part that:

'It was found that there would be medium negative impacts during construction for the local population due the noise and vibration impact of the development. The NVIA acknowledges that despite implementing all feasible and reasonable mitigation measures, noise and vibration impacts are expected during construction at the nearest sensitive receivers when works are undertaken near the site boundaries.' [Emphasis added].

It should be noted that the proposed construction work (which is projected to take three years but is likely going to extend beyond that as most construction projects do) is likely to cause a significant disruption to local residents, and particularly parents who need to drop off and pick up their children from Lane Cove West Public School.

Further, as someone who works from home several days a week, I can attest to the significant disruption that the works undertaken to provide adequate water to the Apollo Place Data Centre have caused. I cannot begin to imagine the disruption to be caused by work undertaken by over 200 full-time construction workers for three years, in seeking to build a very large commercial structure next to an adjoining residential area.

Other considerations/impacts

The EIS has also indicated¹⁵ that *'there are potential medium negative livelihood impacts on existing site tenants and customers relating to essential services and relocation.'*

Question: Given the proposed development, how many existing workers stand to lose their jobs, and how does this compare to the 26 forecast full-time roles which will become available at the operational stage?

Conclusion

For the reasons outlined in this submission, the proposal to construct the Project Mars DC should be rejected. I otherwise submit that the development of a data centre cluster in Lane Cove more broadly is contrary to public policy, particularly from a health and environment perspective. I cannot see anywhere in the EIS a commitment to using renewable energy or recycled water, or indeed any commitment to investigate and adopt best practice for the development of data centres which is used in other jurisdictions. The proposal is contrary to a number of the principles outlined in the Paper, and is therefore counter-initiative.

My primary submission is that the proposal should be rejected outright and that urgent review of use for the Lane Cove West industrial site for the approval of a data centre cluster be undertaken. Failing that, and if the project is to proceed, I submit that:

- (a) Goodman should be required to undertake a further and comprehensive assessment about how the identified risks associated with noise and air pollution will be mitigated (particularly in light of initiatives utilised internationally to reduce harmful emissions); and
- (b) consideration of the proposal should be put on hold until such time as the Inquiry is concluded, and consultation in respect of the Paper is finalised, and a strategic decision on the criteria for approval of further data centres (particularly in such close proximity to residential areas) is established.

¹⁵ Ibid.