

4 May 2026

Planning Minister
NSW Department of Planning and Environment
Submitted via the NSW Planning Portal

Project Mars Data Centre – 12 Mars Road, Lane Cove West NSW (application No. SSD-82052708)

I object to the proposed Project Mars Data Centre (SSD-82052708) and respectfully ask the NSW Department of Planning to refuse consent.

I am a local Lane Cove West resident and have lived here for over 13 years. My family live within 430m of the proposed Project Mars site and my children attend Lane Cove West Public School, about 150 metres from the site. My family uses Blackman Park multiple times during the week and every weekend for sport and recreation.

I consider that the Environmental Impact Statement (EIS) **fails to objectively demonstrate** that the impacts of the proposed Project Mars data centre to the community and environment are acceptable, particularly given the scale of the facility and proximity to the local school and residential areas. The reasons for this submission are set out below with references to the EIS and its appendices.

This submission also includes a number of questions directed to Goodman Property Services (Aust) Pty Ltd (**Goodman**) and NSW Department of Planning and Environment.

1. Noise Impact Assessment and proximity to residential areas

This project is too large and too close to existing and mature residential areas, a school and Blackman Park. The extent of the broad assumptions and predictions in the Noise and Vibration Assessment for a project of this scale and proximity to residential properties and a school is **unacceptable** for the following reasons:

(a) Insufficient noise testing for surrounding properties

The Noise modelling for Mars Road relies on selective receiver locations, not clearly the closest homes. Only three surrounding properties were subject to acoustic testing in the EIS. For a project of this size, it is unacceptable for the Government to consider the Project Mars development **without extensive noise testing in all residential areas adjacent to the proposed site** followed by adequate community consultation on the outcomes of this testing. The noise testing should take into account the facility's operational phase and during the use of the 49 diesel generators (during which time the noise levels will far exceed acceptable thresholds).

(b) Noise modelling in the EIS is based on indicative and not final plant and equipment specifications

The EIS clearly states that **noise modelling is indicative, not final** and that final specifications are to be confirmed at detailed design stage.

Page 33 of Appendix U Noise Assessment:

*“Various items of mechanical plant would also be located internally within the data centre. This includes items within the various data halls, electrical plant rooms and mechanical services areas. **Details regarding these internal items of equipment are not currently available**, however,*

breakout noise from these items is expected to be relatively minor compared to noise from externally located mechanical plant and testing of backup generators given the internal plant areas are generally separated from the external facades by service corridors.

*The exact requirements for all items of mechanical plant would be determined as the project progresses when specifics are known about tenant requirements. **Further noise modelling of all items of mechanical plant would be completed during the production of later noise assessments when the selected mechanical plant is known.***

The Noise Assessment in the EIS is indicative and **leaves no margin for error against the required thresholds**, estimating the Project Mars facility will sit right on the night time residential limit of 36 dB(A).

Comparable noise from existing Air Trunk SYD2 facility as the reference point

The AirTrunk SYD2 data centre at 1 Sirius Road, Lane Cove West is within 500 metres from the Mars Road site.

My family and I have personally walked the bushwalk along the Lane Cove River adjacent to the AirTrunk SYD2 site — roughly 150 metres from the facility — and can confirm the constant hum is clearly audible.¹

This is the lived experience of an existing data center within the same precinct.

In the absence of comprehensive noise testing along the surrounding streets it is impossible for the community to predict and understand what the actual noise levels will be and to reconcile these predictions against what can actually be heard within 150 meters from the AirTrunk SYD2 facility.

The Mars Road neighbours are in a quieter acoustic environment, so any new mechanical hum from the Project Mars facility will be far more perceptible to them than SYD2's contribution is to residents at 150 Epping Road.

The Noise Assessment in the EIS is indicative and **leaves no margin for error against the required thresholds**. If the constant hum noise from an operating data center can be clearly heard in the quiet environment of a bush track 150m away, then I am very concerned with the following real risks:

(1) that the **actual noise levels** are the same or worse in the surrounding streets of Banksia Close and Wood Street if Project Mars facility is approved – the closes residential property is within 50 meters ; and

(2) that this ongoing noise is **carried across the valley over Blackman Park** to Penrose Street and beyond.

The noise assessment in the EIS does not adequately address these real risks. Extensive acoustic testing is required for the surrounding residential areas and need to take into account the facility's operational phase and during the use of the 49 diesel generators (discussed further below).

¹ This was also publicly stated by the local State Member for the Liberal Party, Anthony Roberts MP, who described the noise along the Great North Walk next to the facility as “*a continuing hum, as if there's an air conditioner, you're carrying on your back.*” Residents at 150 Epping Road have publicly said they “*...can hear it all the time.*” The background noise level on Epping Road is high. Banksia Close and Wood Street, by contrast, are quiet residential streets with a low background level, especially at night.

Concern over reliability of pre-construction noise modelling

The noise assessments process undertaken for the Air Trunk SYD2 data center provides a precedent for my concern over the reliability of the pre-construction noise predictions.

There were two publicly available acoustic assessments (Noise Impact Assessments (**NIA's**)) prepared for Air Trunk SYD2 facility.

- (i) **Original pre-construction NIA submitted with the planning application (SSD-9741) – 3 November 2022**² – this was prepared based on theoretical data
- (ii) **Post construction updated assessment: - "Updated Acoustic Treatment Summary" — 9 April 2024**³
– subsequent report prepared as a result of changes to various plant and equipment specifications that were required after construction commenced.

The Updated Acoustic Treatment Summary confirms that the revised noise assessment was required as

“...a result of revised fan speeds and operational conditions for the chiller units compared to the previous theoretical model, as well as the implementation of acoustic treatments installed to the chillers located on the roof of the data centre, including internal acoustic panelling and external sheet metal blanking off chiller ports.”

The changes in the plant and equipment specifications for the Air Trunk SYD2 facility against the original design supports my real concern and lack of confidence in relying on theoretical noise assessments in the EIS, particularly given the lack of detail provided plant and equipment specifications.

The EIS indicates that the predicted noise level is just on the cusp of the sleep-disturbance screening level at the closest residential receiver. Given both the indicative mechanical plant assumptions in the noise assessments and the SYD2 precedent noted above, even a small variance from the predicted level will breach the screening threshold. **Residents and their children live with the consequences of that variance, not those people undertaking the theoretical noise assessment.** The absence of a detailed maximum noise level assessment in the EIS is not acceptable.

Positioning this data center in the proposed location adjacent to a quiet residential area presents a high-level risk of detrimental noise and health impacts for the local community.

Questions: With respect to the noise assessment:

- (a) What are the results of extensive acoustic testing for the surrounding residential areas during both the facility's operational phase and during the use of the 49 diesel generators (discussed further below).
- (b) Has Goodman undertaken any actual noise testing for comparable data center facilities and cross checked this back against the theoretical pre-construction noise predictions for those facilities?
- (c) How will Goodman address the real concern about the robustness and reliability of these predictive noise assessments against what occurs in reality? How can the community get comfortable with the modelling given the Air Trunk facility which can be heard from 150m in quiet surrounds?

² Air Trunk SYD2 – 220364 - Acoustic Assessment Airtrunk Data Centre - 1 Sirius Road, Lane Cove West – dated 3 November 2022

³ AirTrunk SYD2 – Updated Acoustic Treatment Summary: 220364-13 – AT SYD2 - Treatment Summary – R4.4 – dated 9 April 2024

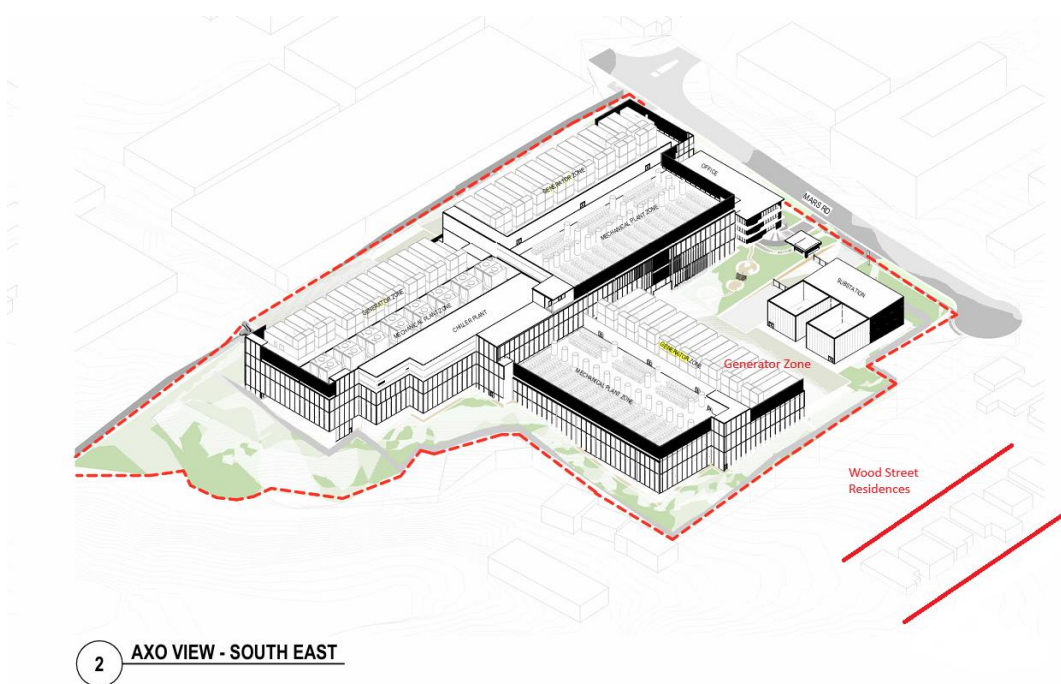
- (d) What assurances can Goodman give the local community on the reliability of the limited indicative noise assessments contained in the EIS in the absence of final plant and equipment specifications?
- (e) How will the risk of subsequent changes to the facility specifications be addressed if the project is approved in its current form? What accountability measures will Goodman put in place to protect the community from this risk?

(c) Diesel generator noise and blackout scenarios not adequately considered

In a power outage (blackout), the EIS predicts noise levels of up to 55 dB(A) at the nearest homes and 59 dB(A) at Blackman Park — up to 19 dB above the night-time criterion.

The EIS’s response is that the scenario “has not been assessed further” **because blackouts are assumed to be infrequent**. The EIS does not adequately provide the community with sufficient details to consider the impact of power outages, including, but not limited to the surrounding residential streets where the highest noise impacts will occur as per the following diagram.

Diagram 1: Generator Zone – Wood Street residences and proximity to generators (Page 6, Appendix B - Architectural Plans)



(d) Construction phase – inadequate details provided on noise and disturbance

The EIS confirms residents will be “highly noise affected” during construction.⁴ The proposed site is within 160m from Lane Cove West Public School. Consistent noise disturbances can interfere with concentration, reduce comprehension, and hinder effective communication between teachers and students within the classroom. Inadequate consideration has been given to the impact on the school and local residents and the Lane Cove West Public School during the 3 year construction phase.

⁴ Appendix U – Noise Impact Assessment, construction section – Page 41

Question: How will Goodman address the impact of the three years of construction noise on the children at Lane Cove West Public School located 160m from the Project Mars site, before, during and after school hours?

(e) Proximity to residential properties

Data Centres Australia, the representative industry body dedicated to data centres in Australia (of which Goodman is a member) states clearly on their website that:

*“Data centres are built on land zoned for industrial development, not residential. However, **we recognise that developments near the boundary of residential areas can have impacts on local communities, and these must be managed sensitively and transparently.**”*⁵

The location of the proposed facility on the boundary of the E4 General Industrial zoned land is **directly** adjacent to residential properties. The EIS relies on the E4 industrial land zoning and **ignores the question of appropriateness of land use** given the adjacent residential properties, public school and Blackman Park recreational facilities. This approach is inappropriate and **inconsistent with the public messaging** delivered by the Data Centers Australia representative body noted above.

Question: How does Goodman justify the location of the proposed data center against this conflicting message presented by its own representative industry body and the cluster of Data Centers being proposed within the same industrial precinct?

2. Air Quality Concerns

I have real concern with the proposed 49 on-site diesel back-up generators and what their actual emissions will be during testing and operations during a power outage. The EIS has not properly assessed the impact on the health and wellbeing of the children, families and other vulnerable people who live, learn and play within a few hundred metres of this site.

Diesel back-up generators are known to produce high concentrations of PM2.5 (fine particulate matter), oxides of nitrogen (NOx), and other air toxics during both routine testing and emergency operation. These pollutants are linked to respiratory and cardiovascular harm, and that the harm will be disproportionate for small children and people with pre-existing conditions.

The Air Quality Impact Assessment included in the EIS (Appendix T)) raises a number of material issues:

- The applicant proposes 49 diesel generators on a single site within 150 m of Lane Cove West Public School, 25 m of Blackman Park, and a similar distance from the childcare centre in the business park.
- The dispersion modelling included 57 receptors, but only a subset of "most impacted" receptors are reported in summary form. It is not clearly demonstrated that the closest homes, the school and the childcare centre were assessed as the worst-case receptors.
- There are internal inconsistencies between the mapped receptor locations (approximately 50 m on Figure 5) and the distances used in the modelling (0.2 km in Table A1)
- The EIS's own modelling shows that during a blackout — the precise event the 49 generators exist to cover — the NSW 1-hour NO₂ criterion is exceeded at four receivers

⁵ Response to the Australian Government’s expectations for data centers and AI infrastructure developers – Media Release: 22 March 2026. <https://datacentres.org.au/response-to-the-australian-governments-expectations-for-data-centres-and-ai-infrastructure-developers/>

- Appendix T also states that routine operational monitoring is not required. There is therefore no post-approval mechanism to verify that real-world emissions match the modelled predictions, and no trigger for remedial action if they do not.

The air quality concerns for the diesel generators mirror those of the noise assessment mentioned at Diagram 1 above for Wood Street residents, given the proximity to the Generator Zone.

Beyond the immediate exceedance, there is very little information in the EIS to assess the cumulative, long-term health impacts of having a cluster of large data centres — each with its own diesel generator fleet — operating in close proximity to a primary school, a childcare centre (in the business park) and an established residential area. **This is an unacceptable basis for approval of such a significant project.**

Questions: Steps need to be taken by Goodman to adequately address the noise and air quality impact of the Generators to the community and how this impact will be monitored once the facility is operating.

- Can Goodman provide the proposed schedule of testing of the Generators and confirm the hours and frequency per generator, per week?
- How will the Generator testing programs be monitored to ensure the stated program frequency is not exceeded and what are the consequences if Goodman exceed the testing frequencies set out in the EIS?
- How will the Generator testing programs be monitored to ensure the actual level of emissions and air quality match the modelled predictions and what are the consequences to Goodman if the actual emissions exceed the predictions?

3. Cumulative impact not adequately addressed in EIS

The immediate precinct already contains or has approved a number of data centers:

- Airtrunk, 1 Sirius Rd - operational 120MW
- Airtrunk, 1 Apollo Pl - under construction 45MW
- Goodman, 12 Mars Rd - on Exhibition 90MW
- DC Alliance, 14 Mars Rd – in planning
- Air Trunk, 3-4 Apollo Pl - in planning 140MW

Each of these facilities relies on diesel generators for back up power. A regional outage would start their generator fleets at the same time and the adverse noise and air quality impacts would compound exponentially. The EIS acknowledges that “the project may result in significant cumulative air quality impacts under emergency conditions.”⁶ **Despite that warning, the cumulative scenario has not been modelled in the EIS.**

⁶ Appendix T – Air Quality Impact Assessment – Page 71: Table 41 - Local Air Pollutant Sources with Potential for Cumulative Impacts

Diagram 2: Current and proposed Data Centre sites within the Lane Cove West Business Park:



The impact of a power outage is compounded by the cumulative impact of the cluster of data centers being proposed in the Business Park. The Lane Cove West Public School and Blackman Park both sit inside a 500 m radius of all four facilities. A combined worst-case scenario — all diesel generator fleets operating simultaneously during a blackout — has not been properly modelled or addressed in the EIS.

Our community was informed in writing by Hon Paul Scully MP of the following:

*“Any applicant proposing a State significant project in NSW is required to undertake a cumulative impact assessment in line with the Cumulative Impact Assessment Guidelines for State Significant Projects. The assessment is informed by baseline information **which considers and evaluates the potential impacts of a proposed project, along with other future projects and their potential for compounding impacts.** The cumulative impact assessment is required to be included in the project’s Environmental Impact Statement (EIS).” (emphasis added)*

The EIS does **not** include a detailed analysis of the **cumulative noise impacts** from a cluster of data centres to the community. The current proposal applies a reduction of 5db to the amenity noise level to allow for potential cumulative impact from other sources in the area. This notional adjustment to the expected noise level is **theoretical and inadequate** given the scale of the cluster of data centers being proposed in such close proximity to residential areas, Lane Cove West Public School and Blackman Park.

A more detailed and data based cumulative assessment is required using actual and detailed data and testing (including with reference to the existing Air Trunk facility).

Parliamentary inquiry and local Council concerns

The cumulative social and health impacts arising from multiple data centres concentrated within an urban precinct, **are being substantially overlooked in the EIS.**

This factor has also been raised by two local councils in submissions to the NSW Parliamentary inquiry into Data Centers⁷

(a) **Lane Cove Council:** Publicly raised the community's concerns about the health and wellbeing impacts of data centres. In its submission to the current Parliamentary inquiry⁸, the Council has expressed concern about, among other things, the health impacts of back-up diesel generators when located near homes and schools, and the noise impact on residents from data centres located close to homes and key social infrastructure such as schools, noting that the noise generated by data centres can be offensive and disruptive and should be a key factor considered prior to approval.

(b) **The City of Ryde Council:** In its submission to the Government inquiry, the Council also call out the issue of combined noise output from multiple facilities operating concurrently and emphasises that air quality impacts from backup generation fleets need to be assessed collectively rather than individually.⁹

A theoretical exercise is not sufficient given the scale of the Project Mars facility and the cluster planned for the precinct.

It is irresponsible for the NSW Government to progress the approval process for the Project Mars data center before the outcome of this inquiry is known and the concerns from the Lane Cove community's own Council submissions to this inquiry are addressed.

Question: How will Goodman properly demonstrate the cumulative noise and air quality impact of the Project Mars data centre on the local residents and broader community in light of the proposed cluster of data centers in the precinct?

4. Visual Impact Assessment

The proposed data center is a dominant industrial-scale building being placed in a sensitive residential environment. There are a number of problems with the way the visual impact of this building has been presented in the EIS.

- (1) **Height.** The EIS itself uses two different numbers — 28.3 m in most places, and 33 m in the SSDA Architectural Design Report (Appendix H, page 6). Measured against the 18 m height control that applies to this site, those numbers are exceedances of 57% and 83% respectively. The fact that two parts of the same submission can't agree on how tall the building actually is, is not a small issue. The community is being asked to accept either a 57% or an 83% breach of the planning standard, depending on which appendix you read.
- (2) **Photographs:** The Visual Impact Assessment (Appendix N) relies heavily on photographs in which the proposed building is partially screened by mature vegetation. That works for a glossy submission, but it does not square with what the rest of the EIS is proposing. The Arboricultural Impact Assessment identifies 90 mature trees for removal, and notes (at section 7.1.2 and Appendix C) that 39 of them could

⁷ The terms of reference for the current government inquiry into Data Centres specifically include consideration of noise and air quality impacts of data centers. Terms of Reference for the NSW inquiry specifically include “(e) local environmental and community impacts, including: (i) (ii) (f) impacts on surrounding communities, including noise, air quality and heat, traffic and construction impacts, land-use conflicts and amenity the distribution of impacts across regions, in particular Western Sydney and other growth corridors.

⁸ Submission No 31 – Inquiry into Data Centers – Lane Cove Council, dated 25 March 2026

⁹ Submission No 41 – Inquiry into Data Centers - City of Ryde Council, dated 26 March 2026. The Ryde Council notes that a Social Impact Assessment (SIA) is required for data centre proposals progressing through the SSD process, typically as a SEARs requirement, and must be prepared in accordance with the Social Impact Assessment Guideline and Technical Supplement (DPHI, 2025). This process requires a rigorous assessment and rating of social impacts.

not be replaced within 10 years or more. I could not find a single visualisation in Appendix N showing the building as it would appear after that vegetation has been cleared. That is the view that matters, and it is missing.

- (3) **Viewpoints:** The choice of viewpoints is also too narrow. The corner of Avalon Avenue and Banksia Close — where hundreds of Lane Cove West Public School parents and children walk to and from school every day — does not appear in the assessment. Neither do the views from inside Blackman Park itself: the skate park, the tennis courts, and the playing fields where local families spend their weekends. The decks and back yards of homes on the western side of Wood Street, the houses on Banksia Close, and the double-storey homes nearby are likewise absent from the report.

A visual impact assessment that excludes the locations where most residents and park users will actually see the building is not a serious assessment.

Without those viewpoints, and without renderings that show the proposed facility stripped of the 90 trees the applicant itself intends to remove, the EIS materially understates the scale of the visual change this development will impose on this part of Lane Cove West.

Question: Can Goodman provide the photographs, imagery and renders of the viewpoints without the coverage from the 90 trees that are planned to be removed to accurately present the visual impact of the proposal?

5. Environmental concerns

The site sits directly next to C2 Environmental Conservation zoned land. This is Council-managed bushland and the Council's Community Nursery. C2 zoned land is reserved for land of high ecological value that is meant to be protected, managed and restored, not bordered by a continuously operating industrial-scale facility. The Council's Community Nursery — whose function is, literally, the propagation of native vegetation to support local bushland regeneration — sits approximately 15 metres east of the site.¹⁰

Site is adjacent to bushland (C2) on eastern and southern boundaries:



¹⁰ Appendix U – Noise Impact Assessment: Table 2

Within the site itself, the EIS proposes the removal of approximately 90 trees¹¹ and the clearing of around 0.8 hectares of native vegetation, including identified vegetation communities and habitat areas of conservation value¹². Mature trees cannot be meaningfully replaced in the short term, even with advanced replacement plantings, and the loss of these mature trees carries compounding visual, ecological and amenity consequences for the area. These consequences are not adequately addressed in the EIS.

Question: What measures are Goodman taking to ensure that there is no damage to trees and vegetation that is proposed to be maintained during the extensive construction process in particular, on the C2 zoned land?

Summary

This is a residential area, close to a public school and to Blackman Park – one of the most popular sporting and recreational areas in Lane Cove. There is already a significantly large data centre within 500 metres of the proposed 12 Mars Road site. Allowing the proposed Goodman data centre to proceed would be detrimental to the health and safety of the surrounding school children, residents and environment.

For all the reasons set out in the above submission, this proposal should be rejected.

Resident, Lane Cove West

¹¹ Appendix M – Arborist Report

¹² Appendix S — BDAR