

Submission — Objection to Mamre Road Data Centre Campus (SSD-92743706)

To: NSW Department of Planning, Housing and Infrastructure

I am writing to formally object to the proposed Mamre Road Data Centre Campus at 706–752 Mamre Road, Kemps Creek (SSD-92743706).

I strongly believe this project is far too large and resource-intensive for this location, and I am particularly concerned about the environmental impact, loss of vegetation and habitat, water and electricity consumption, diesel infrastructure, emissions, noise and the cumulative impact of data centres across Western Sydney.

This isn't just another industrial building. The scale of this proposal is enormous, and I don't believe the environmental consequences should be brushed aside because it is being described as an employment or technology project.

1. The sheer scale of the development

The proposal is for a **1 GW data-centre campus consisting of six large data-centre buildings**.

The NSW Planning Portal identifies **936 cooling units, 852 diesel backup generators and approximately 14,430 kL of diesel storage**.

That is an enormous amount of infrastructure for one site.

I am concerned that the impacts of a development of this scale are being considered too much as an individual project rather than as part of the much bigger expansion of data centres happening across Western Sydney.

2. The environmental impact needs to be taken seriously

The project requires the removal of existing vegetation and the infilling of **six existing dams**.

The ecological documentation for the project identifies both native and non-native vegetation on the site, and Penrith City Council has identified approximately **215 trees proposed to be removed**.

I understand that this is not untouched bushland and I am not claiming that the entire site is pristine habitat. However, that does not mean the vegetation and water features have no ecological value.

Western Sydney has already lost huge amounts of natural vegetation to development. Every remaining area of vegetation, mature tree canopy and habitat feature becomes more important as development continues.

Removing 215 trees and filling six dams to construct a massive industrial facility should not be treated as an insignificant environmental impact.

3. Wildlife and habitat

The six dams and existing vegetation provide habitat and movement resources for local wildlife.

The proposal would permanently remove these features.

My concern is not only the impact on individual animals at this particular site, but the cumulative loss of habitat across Western Sydney as development continues.

I believe the Department needs to consider the cumulative impact of repeatedly removing vegetation, dams and other habitat features throughout the region.

It is easy to say that an individual site has limited biodiversity value. But when this happens across thousands of hectares of Western Sydney, the combined impact is very different.

4. Water consumption

The project's own sustainability assessment estimates a **minimum base-case operational water consumption of approximately 22.4 million litres per year**.

That is approximately **22.4 million litres every year** for one data-centre development.

The same assessment projects approximately **1.09 billion litres of water over the assessment period**.

I find this particularly concerning given the increasing pressure on water resources in Western Sydney.

I do not think it is enough to simply say that the project will use recycled or alternative water sources where possible. The Department needs to consider the actual cumulative water demand created by this development alongside the many other data centres being proposed in the region.

5. Electricity demand

The proposed campus has a capacity of **up to 1,000 MW (1 GW)**.

That is an extraordinary amount of electricity.

This raises questions about where the electricity will come from, what additional infrastructure will be required to supply it, and what the cumulative impact will be as more hyperscale data centres are connected to the electricity network.

I am concerned that the community should not be expected to accept major environmental and infrastructure impacts simply to facilitate rapidly increasing private demand for data-centre capacity.

6. Greenhouse gas emissions

The project's own greenhouse-gas assessment estimates approximately:

- **998.8 tonnes CO₂-e per year of Scope 1 emissions**
- **1,699,710 tonnes CO₂-e per year of Scope 2 emissions**
- **approximately 1.70 million tonnes CO₂-e per year for Scope 1 and 2 combined**
- **approximately 2.03 million tonnes CO₂-e per year when the specified Scope 3 emissions are included**

I understand that Scope 2 emissions are associated with purchased electricity rather than being direct emissions from the buildings themselves.

However, I believe this distinction actually makes the electricity issue more important, not less.

A facility capable of consuming this much electricity has an enormous associated carbon footprint depending on how that electricity is generated.

The Department should consider the full lifecycle and cumulative emissions associated with powering this development rather than looking only at emissions produced directly on the site.

7. 852 diesel generators

The proposal includes **852 diesel backup generators**.

This is an extraordinary amount of diesel-powered backup infrastructure.

These generators may not operate continuously, but they still create potential impacts associated with:

- air emissions during testing and operation
- noise
- fuel storage and handling
- fire risk
- transport of fuel
- potential spills and contamination

There are also nearby schools and other sensitive receivers.

The **Catholic Schools Parramatta Diocese has specifically raised concerns about air quality associated with generator testing and emergency operation at nearby schools**, including Emmaus Catholic College and Trinity Catholic Primary School.

That is not a theoretical concern that I have invented. It has been raised by a relevant stakeholder representing nearby schools.

8. 14.43 million litres of diesel storage

The proposal includes approximately **14,430 kL of diesel storage**.

That is approximately **14.43 million litres of diesel** on the site.

The sheer volume raises obvious questions about fire safety, spills, leaks, contamination, stormwater and emergency management.

I am not saying that a spill or fire will occur.

I am saying that when a project proposes storing more than 14 million litres of diesel, the environmental consequences of a major incident need to be taken extremely seriously.

9. Air quality

The combination of 852 diesel generators, construction activity, vehicle movements and other industrial infrastructure creates potential air-quality impacts.

I am particularly concerned about nearby schools and other sensitive receivers.

The Department should ensure that air-quality modelling considers not just normal operation, but generator testing, emergency operation and cumulative emissions from other industrial developments in the surrounding area.

10. Noise

This project will contain hundreds of generators and hundreds of cooling units, as well as extensive mechanical and electrical infrastructure.

Noise is therefore not simply a temporary construction issue.

The project will operate continuously, and the nearby community could potentially be exposed to mechanical, cooling and generator-related noise over the long term.

Concerns have also been raised about tonal, low-frequency and intermittent noise affecting nearby sensitive receivers.

The Department should ensure that the assessment properly considers the long-term operational noise environment rather than focusing primarily on construction noise.

11. Construction could last around 10 years

The construction period is expected to extend for approximately **10 years**.

That means nearby residents, schools, workers and other members of the community could experience years of:

- heavy vehicle movements

- dust
- construction noise
- vibration
- traffic disruption
- air-quality impacts
- vegetation clearing
- general construction disturbance

Ten years is not a short-term inconvenience.

It represents a significant period of people's lives.

12. Urban heat

The removal of approximately 215 trees is particularly concerning in Western Sydney, where extreme heat is already a major issue.

Replacing mature vegetation with enormous buildings, concrete, roads, hardstand and other infrastructure will change the character of the site and its ability to provide shade and cooling.

Trees take many years to mature.

Planting replacement trees after construction cannot immediately replace the ecological and cooling benefits provided by established trees.

This should be considered in the context of Western Sydney's broader urban heat problem.

13. This site is already being identified as unsuitable

Penrith City Council has formally objected to this application as well.

Council has stated that the site is not suitable for a development of this scale and has raised concerns including building height, vegetation removal, urban heat, traffic, construction impacts, air quality, noise, parking, water and electricity demands.

I strongly support Council's position.

The fact that the local government has assessed the proposal and concluded that the site is unsuitable should carry significant weight.

14. The cumulative impact cannot be ignored

This is probably my biggest concern.

Western Sydney is becoming a major data-centre hub, and this proposal needs to be considered alongside other existing and proposed developments.

One data centre might appear manageable when looked at on its own.

But when you have multiple facilities competing for:

- electricity
- water
- land
- road capacity
- transmission infrastructure
- construction resources

the cumulative impact becomes much more significant.

I don't believe it is responsible to keep assessing each development separately without properly considering what Western Sydney will look like after all of these projects are built.

Conclusion

I Lani Marie strongly object to the Mamre Road Data Centre Campus and request that **SSD-92743706 be refused**.

My objection is based on the scale of the proposal and its cumulative environmental and community impacts.

This one project would involve:

- **1 GW of electricity capacity**
- **852 diesel generators**
- **14.43 million litres of diesel storage**
- **936 cooling units**
- **approximately 22.4 million litres of minimum estimated water consumption every year**

- **approximately 1.09 billion litres of projected water consumption over the assessment period**
- **approximately 215 trees proposed for removal**
- **six dams proposed to be infilled**
- **approximately 10 years of construction**
- **and an estimated 1.7 million tonnes of Scope 1 and 2 CO₂-e emissions per year at maximum operational capacity**, according to the project's own assessment.

These are not small environmental impacts.

I understand that technology and data infrastructure are important, but that does not mean every proposed data centre should automatically be approved.

Western Sydney is already experiencing enormous development pressure. We need to consider whether sacrificing more vegetation, habitat, water and infrastructure capacity for increasingly large data centres is actually in the long-term interests of the people and environment of Western Sydney.

I respectfully ask the NSW Government to take these impacts seriously, consider the cumulative effects of data-centre development across the region, and **refuse SSD-92743706**.

I strongly object to the Mamre Road Data Centre Campus.