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20 August, 2026

NT Environmental Protection Authority
Uploaded to: https://ntepa.nt.gov.au/consultation/make-a-consultation-submission?id=1622111

To Whom it May Concern,

Project Ares submission

I was born and reside in the Northern Territory. As a nurse my priorities are healthy environments and communities (healthy country = healthy people).

I have lived, and still work, in the Barkly and am opposed to the ongoing industrialisation of this region through 'intensification of land uses' – increased cattle densities, unconventional gas mining (fracking), land clearing, irrigation and clearing for solar. These activities are not helping to the make this wonderful, jewel of the NT, better - they are just sacrificing this country and our population's health to the short-term, ultimately ecocidal and genocidal visions and profits of big industry.

Rushing into enormous hyperscale datacentres is further putting environments and communities at risk. These centres, and artificial intelligence which is driving demand, are unnecessary and dangerous. There is no demonstrated social licence for this use.

I am particularly opposed to the Project Ares proposal as:

1. This location is a stronghold for the Greater Bilby. It is a special location in close connection to Newcastle Waters and Lake Woods, a wetland of international importance for birds.
2. Solar precincts that may be used to power the centres likely threaten native species including insects, bats and birds due to the 'Lake Effect' – rigorous research demonstrates that large solar farms are mistaken for wetlands with catastrophic impacts. These risks are major, not properly understood and not properly addressed in the application. Please see Appendix A - my submission on the Muckaty Precinct regarding concerns related to large scale solar precincts
3. Using fossil fuels as a power source will increase GHG emissions by an absolutely unacceptable amount. These emissions are avoidable (the NT is facing another catastrophic and expensive fire season, the risk of which is being fuels by global warming that is directly and irrefutably linked to GHG emissions).
4. Land clearing causes irreversible destruction of ecosystems, plants, animals, soils and waters.

5. The NTEPA should not assess projects that do not have regulatory safeguards in place (evidence based rules that are democratically established and that are based on rigorous science and traditional knowledge), or those that are obviously being rushed because of speculative geopolitical demands (economic bubbles which could / will burst) etc. It is your role and responsibility in our system to be the cool, calm actor, to be prudent and align with the precautionary principal to which you are bound under our law.
6. This applicant has no publicly available history of managing data centres, let alone in the Northern Territory. There is nothing in this application that gives confidence that they have demonstrable capacity to manage this high risk enterprise with any serious skill or care.
7. Is not the full proposal – the applicant also wants to build an ammonia plant on Murranji Station (the full plan needs to be on the table before it is considered to avoid incrementalism).
8. Is based on desk studies using data gathered by others for different reasons and in different times (at the end of a drought). This is highly inadequate given the scale of what is proposed.
9. Is not part of a regional plan that has been subject to community consultation.
10. The community consultation – a 'Have Your Say' that has extremely limited reach and is inaccessible to most. I don't know how many submissions you will receive but I know from living here that most people have no idea what you are about to embark on and many more than you will hear from deserve the chance to be involved in such existential decisions about what happens to the country that is their future. At least organise a few community meetings, letter box drops etc.

Recommendation

1. You reject this proposal
2. You instigate a public moratorium on hyperscale data centres while regulatory standards for data centres are not in place.
3. Subject to addressing the many concerns with the proposal and lack of industry regulation, any resubmitted application for the site be subjected to the highest level of environmental impact assessment.

Thank you for your consideration of my concerns.

Sincerely,

Jacqueline Arnold

APPENDIX A – SUBMISSION TO NTEPA ON MUCKATY SOLAR PRECINCT

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NTEPA
Via https://ntepa.nt.gov.au/consultation/make-a-consultation-submission?id=1566984

25 November, 2025

To Whom it May Concern,

Thank you for the opportunity to communicate my concerns about the environmental impacts of building the massive SunCable Precinct in the proposed location on Muckaty Station.

I want to see the NT transition to renewable energy but the impacts of all industrial developments must be minimised. Costs to the environment are not justifiable to minimise costs for developers.

ISSUE	WAYS TO MINIMISE NEGATIVE IMPACTS
Unchecked growth in demand for energy makes: • any kind of supply unsustainable • claims that such precincts are part of a transition unconvincing (we are just adding massive expansion of solar to massive expansion of gas here in the NT, there clearly is no transition planned)	• Take urgent comprehensive all of government action to reduce demand for energy

Installation of a huge number of solar panels which take up a lot of space. Clearing of native vegetation (where required) destroys ecosystems, causing widespread death of plants and animals, loss of threatened species and greenhouse gas emissions.
 	
This site is especially problematic involves clearing a bilby stronghold. The case for this has not been justified and the impacts on bilbies is shamelessly understated in the proposal.
	• Site selection
	  ○ Install panels on land that is already cleared.
	  ○ Avoid areas with threatened species
	• Agri-solar generation is recommended by the Clean Energy Council.
	I just drove from Charters Towers to Cloncurry – almost all the land between these two locations is completely cleared and full of nothing but weeds.

	I understand country that is not being used for industrial purposes is seen by some as wasted, but this is not the case – such country is offers the only true hope for future resilience. I also understand pastoral lease holders are difficult to deal with, but at the end of the day they are on public land and their interests should not override what is best for the NTs future.
Some solar power plants require large amounts of water for cleaning solar collectors and concentrators or for cooling turbine generators.	Design, operations and maintenance must minimise water consumption
Production of huge number of solar panels which require material such as metals and glass that are energy intensive to make, have a finite lifespan (around 35-40 years) and will become waste	Recycling must be mandatory www.energy.gov/eere/solar/end-life-management-solar-photovoltaics
Some solar cells use hazardous chemical and heavy metals. This creates risks of toxic waste streams and environmental pollution	Strict planning and regulation of waste handling
Mining of non-renewable rare earths has significant negative environmental impacts and produces large amounts of toxic waste[5].	Ensure suppliers of rare earths follow best practice and are strongly regulated
Solar farms are recognised as having major and complex impacts on bird, bats and insect communities. Native vegetation and proximity to Lake Woods makes Muckaty an especially bad site choice and has not been adequately justified by the proponents.	Detailed investigations to understand local issues Implement strategies to minimise risks Choose already degraded areas to minimise impacts
Impacts on waterways and receiving wetlands (Lake Woods) from changes in flow intensity and transport of sediment, pollutants and spread of weeds	Site selection: • Avoid water courses • Locate in the upper part of the catchment. • Avoid locations of high conservation value (this site drains towards Lake Woods, a wetland of international Conservation Importance) • Design measures like buffers and site layout

	• Operational measures – e.g. weed hygiene, monitoring, environmentally friendly cleaning products
Impacts from power delivery systems. Powerlines • Installation involves land clearing causing loss and fragmentation • Hinder animal movement • Causes changes in microclimates • Noise pollution • Impact archaeological and cultural heritage, soil and water erosion and are associated with spread of weeds. https://eecs.uq.edu.au/files/24307/00_Summary_Report-1.pdf	• Locate close to demand point • Co-locate with other 'linear infrastructure' • Carry out rigorous environmental impact assessment

The planned location is too close to Lake Woods, the ecosystem is relatively intact and is home to threatened species including the greater bilby, grey falcon and yellow spotted monitor.

1. **This project should be built on already cleared land, and especially not in threatened species habitat and close to international significant wetlands.**
2. **The project needs to be subjected to the highest level of environmental impact assessment by the NT EPA with opportunities for public input.**

Regards,

Jacqueline Arnold