Submission on 12 Mars Road

I object to the Project Mars Data Centre.

Proximity to residential, educational and community properties

The proposed Project Mars Data Centre is located within the Mars Business Park which is zoned as E4 General Industrial. Under the *Lane Cove Local Environmental Plan (2009)* the objectives of land zoned as E4 includes:

- To minimise any adverse effect of industry on other land uses.
- To ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties.
- To recognise the close proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses.

As noted in the EIS, data centres are permitted with consent in land zoned as E4 General Industrial. However, the proposed location of the data centre at 12 Mars Rd would place the data centre on the very boundary of the E4 zoned land, directly abutting a community nursery and residential properties (zoned R2 – Low Density Residential) immediately to the East of the facility, Blackman Park a vibrant sports and environmental public space (zoned RE1) to the South and a Public Primary School only 160m to the north-east. The nearest residential property is less than 50 metres from the proposed facility and unlike for other approved or constructed data centres in Sydney, there are no major or arterial roads with high levels of ambient noise, separating residents from the facility.

The nearest residential properties on Banksia Close, Avalon Ave and Wood St are located on quiet suburban streets with local traffic. Approving a 24/7 data centre at this location on the very perimeter of the zoned E4 area infringes on the objectives of E4 zoning and exacerbates issues such as visual amenity, potential air emissions and constant noise impacts on residents. Having walked past the AirTrunk facility located in Mars Rd and the NextDC data centre at Artarmon the noise from these centres is noticeable from almost 150m away.

The current business operations in the Eastern section of the Mars Rd business park (where the data centre is proposed to be located), co-exist without issues in close proximity to residential and educational receivers due to the types of industrial activities (e.g. warehousing) adjacent to those sensitive receivers. A data centre however has a completely different profile with respect to its visual amenity, environmental, human health, air quality and noise impacts than other low impact industrial uses common to the Mars Road business park.

Where other conflicts of land uses occur, NSW planning has previously provided guidance on incorporating appropriate buffer zones into the planning process. The benefits of setting clear buffer zones between industry and residential areas or other sensitive land uses provides clarity for industry and communities and lessens potential ongoing impacts and conflicts between land uses. Consideration at a strategic planning level must be given to implementing minimum distances from data centres to residential properties within NSW for reasons such as minimising risks of cyber and physical attacks (s1.4 of the Social Impact Assessment EIS), maintaining amenity for adjacent landholders, lowering risks of air pollution from back-up diesel generators and protecting residents from ongoing industrial noise. Other jurisdictions

around the world are implementing or investigating buffers of between 200 and 300m between residential areas and data centres. NSW needs to follow suit.

Data Centres Australia, the peak representative body dedicated to data centres in Australia notes 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."*[1]

The location of the proposed facility **on** the boundary of the E4 zoned area and directly adjacent to residential properties make this proposal inappropriate.

Inadequacies within the Noise and Vibration Impact Assessment report

There are several issues within the Noise and Vibration Impact Assessment report prepared by SLR Consulting that make it unclear as to whether the operational noise of a data centre at 12 Mars Rd and its impact on sensitive receivers has been adequately assessed.

Firstly, additional residential receivers should have been selected on the western side of Wood Street (within NCA02 per the EIS) and further south on Wood Street (within NCA03). Given the topography of the area these residents could be significantly impacted from noise from the proposal, the selection of one receiver (L03) in this street is not representative of the potential impacts on these properties from the proposed data centre.

Secondly, the area around the Lane Cove River, Blackman Park and the proposed location of the data centre is known to commonly experience significant temperature inversions particularly in autumn and winter. During these inversions, noise in the area surrounding Blackman Park, the industrial area and as far away as Riverview are often significantly amplified. Section 4.2.7 of the Noise and Vibration report states
"The nearest sensitive receivers are generally within 350 m of the proposal site and the effects of weather on noise levels are expected to be minimal…As such, the assessment has conservatively applied noise-enhancing weather conditions for all periods as per Option 1 of Fact Sheet D of the NPfI." It is unclear whether these common temperature inversions have been accounted for.

Thirdly, the Noise and Vibration report identifies in Section 2.1 that unattended noise monitoring was completed in the study area in February, March, April, November and December 2025. It should be noted that throughout this period continuous and extensive infrastructure work was being undertaken by Interflow Pty Ltd. These works were to install additional mains water infrastructure to another data centre in the Mars Road business park and were a significant source of noise with construction activity occurring on a daily basis between October 2024 to the present (April 2026). The noise included road cutting, heavy vehicle movements, digging, construction and paving which were undertaken during both the day and night along Banksia Close, Cullen St and Hallam Ave during the periods identified by SLR when unattended noise monitoring was undertaken. There is no mention in the EIS of this construction activity and how it contributed to the baseline noise results in the EIS.

[1] https://datacentres.org.au/response-to-the-australian-governments-expectations-for-data-centres-and-ai-infrastructure-developers/

At several points during the report, it is made clear that all equipment (both for the operation of the data centre and the mitigation measures e.g. louvres) are indicative only and will be reviewed during a later design stage of the project. Approving a project of this scale, in such close proximity to sensitive receivers without fully being able to assess the actual noise impacts is inappropriate. In relation to the assessment for annoying noise characteristics, which is one of the key concerns for residents for a facility operating 24/7, the noise and vibration report concludes that *"additionally, all mechanical plant is indicative and will be reviewed during detailed design once tenant requirements are confirmed"*.

As detailed in a recent media article[2] there are significant risks with allowing data centres to 'build first and verify later'. As stated in the article, the AirTrunk data centre in the same industrial park is exceeding night-time noise limits by 11dB(A) at the closest sensitive receivers. Noting that those receivers are much further away (>150m) from the AirTrunk facility than the nearest sensitive receivers to the proposed Project Mars facility (<50m). The article also states that:
"During Planning NSW's assessment for SSD-9741's third modification, its own report found that Phase 1 alone – just 25 per cent of the full facility – was already operating 5 dB(A) louder than the noise predicted for all four phases combined. The discrepancy was attributed to chiller fan speed loads running at 60 per cent rather than the assumed 35 per cent." This demonstrates the issues associated with using assumptions, without detailed designs, like those included in SLR's Noise and Vibration report, to assess performance and adherence with regulatory noise limits.

A 24/7 data centre located directly adjacent to a quiet residential area carries an unacceptable high level risk for the ongoing and detrimental impacts of noise and its impacts on human health.

Visual amenity issues

The Visual Impact Assessment report used limited and selective viewpoints that understate the impact of the development on the surrounding community. The proposed height of the development is routinely referenced throughout the EIS as 28.3m which is a 57% exceedance on the currently maximum permissible height standard of 18m. Notably in the SSDA Architectural Design Report (Appendix H) the maximum height of the development is cited as 33m which would be a 83% exceedance. The Visual Impact Assessment report appears to rely heavily on vegetation coverage in many of its photos depicting viewpoints to demonstrate the low impact of the proposed facility on amenity throughout the local area. However, the Visual Impact Assessment report does not include representations of the facility with the removal of the 90 mature trees proposed within the Arboricultural Impact Assessment Report. With 39 of those trees (as per 7.1.2 and Appendix C of the Arboricultural Impact Assessment Report) being trees that could not be replaced in 10 or more years.

Without factoring in the removal of the 90 trees and using only a limited number of viewpoints that do not represent the most affected areas, the EIS has failed to comprehensively address the scale of the amenity issue that will be caused by the data centre. Aspects such as the corner of Avalon Ave and Banksia close, where hundreds of Lane Cove West parents and students walk everyday have been discounted from this amenity assessment as have aspects

[2] https://inthecove.com.au/2026/04/28/lane-cove-data-centre-compliance/

from Blackman Park such as the skate park and the tennis courts. Viewpoints from the decks and backyards of residents on the western side of Wood Street, properties on Banksia Close and double story properties within the vicinity are also not taken into account in the Visual Impact Assessment Report.

Air quality and noise concerns with back-up diesel generators

Backup generators produce high levels of $PM_{2.5}$ (particulate matter), NO_x (nitrogen oxides), and other air toxics during testing and emergency operations. These emissions can contribute to respiratory and cardiovascular issues, particularly when testing cycles create "episodic but intense" pollution. As a resident with primary school aged children that attend Lane Cove West Public School, I am concerned about the potential use of the back-up generators and the acute impact this could have on the community, particularly with small children less than 160m from the proposed facility. This is also the case for the childcare centre also located within the business park.

Cumulative Impacts, Infrastructure demands and Strategic Planning

Recent media articles have advised that up to four data centres are being proposed within the Mars Rd Business Park. There appears to be no strategic consideration by the proponent or the NSW Government of the cumulative impact of clustering these projects in relatively high concentrations. The clustering of data centres in business parks such as the Mars Rd business park ensure that the risks (human health, environmental, security and cyber terrorism etc) posed by a single facility are significantly amplified.

The Air Quality Impact Assessment Report, notes that in an “emergency scenario” (such as a grid outage in the area) the cumulative impacts of the AirTrunk project, and the Apollo Place Data Centre would mean that the project (Project Mars) “may result in significant cumulative air quality impacts under emergency conditions”. Given the location of residential and sensitive receivers in the area (including a childcare centre and primary school) the clustering of these centres in one local area presents an unacceptable risk to the local community. Particularly when it is considered that grid outages are relatively common an “emergency scenario” may be a relatively common event. In the Air Quality Impact Assessment report the only mitigation measure proposed in the event of an emergency condition is that “neighbouring properties will be notified in the event that emergency operation of all the generators is required”. This would appear to be woefully inadequate given the commensurate level of risk posed by the concurrent operation of possibly over 200 diesel generators in the business park from data centres alone.

There are also residents (and members of the Lane Cove West school community) have had over 18 months of construction work in Banksia Close, Cullen St and Hallam Ave to upgrade water infrastructure to the AirTrunk data centre located in the west of the business park. This is an example of a facility that was located away from residential properties but is still generating a significant burden on the local community due to the infrastructure and service demands of these centres. It is unclear whether additional infrastructure capacity (either water services or electricity) will need further upgrades as a result of the potential clustering of more data centres in the Mars Rd business park.

I would also like to comment that depicting an 90MW, extremely energy and water intensive data centre as a “modern parallel” to the sustainable fishing practices of the Cammeraygal people is crude and makes a mockery of the care and stewardship of country demonstrated by generations of traditional owners.

In summary, this proposal should be rejected based on the extremely close proximity of sensitive receivers to the proposed facility and the significant impacts of the facility on air quality, noise pollution, visual amenity and impacts on bushland.