

## **Mars Road Data Centre Objection**

I am writing to formally object to the proposed Mars Road Data Centre in Lane Cove West. As a resident living in the immediate vicinity of the site, I am deeply concerned about the long-term impacts on our community's health, amenity, and environment.

My objection is based on the following critical flaws in the submission and included Environmental Impact Statement (EIS):

### **Unaddressed Cumulative Impact**

The submission and EIS fails to assess the cumulative impact of multiple data centres within the Lane Cove West industrial area. There is already in operation the Apollo Place Data Centre by Airtrunk at 1 Sirius Road, Lane Cove West And 1 Apollo Place, Lane Cove West plus other proposed or recently endorsed data centers in the Lane Cove West Industrial Area. See Figure 1 and reference copied in italics below from the Lane Cove Council Submission to the Department of Planning and Environment regarding the Project Mars Data Centre (SSD-82052708).

Adding another large-scale facility without a comprehensive study of the combined noise, heat, pollution and traffic load is irresponsible and provides an incomplete picture of the actual impact on water resources, energy capacity required, air quality impact, noise and vibration impacts etc.

*“This is of significant concern given the site transitions to the R2 Low Density Residential and C2 Environmental Conservation zones and the sites proximity to multiple public facilities. The 4 sites shown in Figure 1 have a combined site area of 143,000 sqm and given the established targeting of Lane Cove West, further Data Centres are likely to be proposed within the area. An analysis on resource use should be provided which considers the demands on water and electricity. Consideration must be provided on the accumulative impacts including the following developments:*

- The recently constructed Apollo Place Data Centre by Airtrunk - SSD-67407231 - 1 Sirius Road, Lane Cove West And 1 Apollo Place, Lane Cove West.*
- The proposal to extend this precinct by Airtrunk known as the Mars Road Data Centre - SSD-108835458 - 3-4 Apollo Place And 87-91 Mars Road, Lane Cove West.*
- The Lane Cove Data Centre Alliance which has been recently endorsed by the NSW Governments Investment Development Authority – 16 - 20 Mars Road, Lane Cove West.*

- Figure 1 below illustrates that approximately 40% of the Industrial Zone is proposed to be occupied by Data Centres – consideration should also be given to the scenarios where 50%, 75% and 100% of the Industrial Zone are occupied”



Figure 1: Data Centres currently existing or proposed for Lane Cove West with the subject site shown in green (Source: Nearthmaps)

## Inadequate Noise Modelling

The noise studies provided are insufficient and fail to account for local topography. The proposed site at 12 Mars Road sits on a high ridge in the industrial area, directly overlooking Blackman Park. As the park is significantly lower in elevation than the Mars Road ridge, it forms a natural basin.

- The Amphitheatre Effect: Blackman Park, located directly below the site, will act as a natural amphitheatre.
- Sound Projection: This topography will significantly amplify and project the constant low-frequency hum of cooling fans into residential areas. Noise from rooftop cooling systems and fans has a direct, unobstructed "line of sight" down into the park and the surrounding residential valley due to various proposed placements of cooling systems and fans.
- Health Concerns: The 24/7 nature of this noise has not been properly modelled for nighttime hours or atmospheric variations.
- Acoustic Focusing: Like an amphitheatre, the steep slopes surrounding the park can cause sound waves to bounce and "pool" in the lower areas, potentially making the 24/7 mechanical hum louder and more persistent for

those in the park or at the base of the ridge than predicted by standard flat-ground models.

## **Flawed Air Quality Studies**

The air quality assessments included in the submission and EIS do not reflect the true size and scale of this project.

- **Scaling Issues:** The data used appears to be based on smaller facilities and does not account for the massive backup power generation requirements of a centre of this magnitude.
- **Resident Exposure:** There is a lack of rigorous analysis regarding the emissions during testing or emergency operation of diesel generators near high-use recreation areas like Blackman Park, Lane Cove West Public School and local residents.

## **Inconsistent Measurements**

Inconsistencies in measurements and data points used regarding the data center. These discrepancies undermine the reliability of the work done and the overall proposal. Eg. EIS confirms 81 megawatts of total overall power consumption but also reported as 90 MWs in other instances. Generator testing is stated as quarterly during business hours, but annual testing hours are different in different reports - 122.5 hours in the EIS and 155.2 hours in the Air Quality Impact Assessment

## **QUESTIONS to please be answered/addressed:**

### **1. Topographic Acoustic Amplification**

The current noise modelling uses standard hemispherical propagation over flat ground. How has the developer specifically accounted for the 'amphitheatre effect' of the Mars Road ridge and Blackman Park basin, which acts as a natural acoustic reflector that can amplify low-frequency humming by up to 3–5 dB beyond standard model predictions?

### **2. Real-World Mechanical Specifications**

Since the EIS noise assessment is based on assumed equipment rather than final, confirmed mechanical specifications, will the developer agree to a legally binding 'Zero-Exceedance' clause? Specifically, how will they guarantee that actual operational noise won't mirror the failures seen at nearby facilities like AirTrunk

SYD2, where noise has already reportedly exceeded the levels predicted in its own EIS?

### 3. Cumulative Air Quality & Grid Instability

Given that Lane Cove West has documented power instability and brownouts, the facility will likely rely on its massive diesel backup generators simultaneously with other nearby data centres during a grid failure. Why does the EIS only model isolated generator testing rather than the cumulative air quality impact of multiple hyperscale facilities operating diesel generators at 100% load during a shared local outage?

### 4. Heat Island & Microclimate Impact

Data centres of this magnitude vent significant amounts of waste heat. Has the developer conducted a microclimate study on how the thermal plume from 12 Mars Road, when combined with the existing 'heat cluster' of nearby data centres, will affect the delicate ecosystem of the adjacent Lane Cove River bushland, the Community Nursery and nearby residential areas?